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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

TURNER BROADCASTING SYSTEM,  
INC., et al.,

Plaintiffs,

v.

FEDERAL COMMUNICATIONS  
COMMISSION, et al.,

Defendants.

Civil Action No. 92-2247  
(and Consolidated Cases  
Civil Action Nos. 92-2292,  
92-2494, 92-2495, 92-2558)

(SFW, TPJ, SS)

APPENDIX TO  
PUBLIC BROADCASTER DEFENDANT-INTERVENORS'  
MOTION FOR SUMMARY JUDGMENT

VOLUME 4

(EXPERT WITNESS DECLARATIONS)

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Service, and Corporation for  
Public Broadcasting

Dated: May 26, 1995

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**DECLARATION OF JONATHAN C. ABBOTT**

1. I am Jonathan C. Abbott, Senior Vice President of Development and Corporate Relations of the Public Broadcasting Service ("PBS"). In that position, I supervise PBS's efforts to assist public television stations in generating voluntary contributions and support from individuals, corporations, and foundations. I have held this position since I joined PBS in 1992.

***Professional Background***

2. Prior to joining PBS, I served as Vice President for Marketing and Development for KQED, Inc. ("KQED") in San Francisco, California. KQED operates public television and radio stations serving Northern California. At KQED, I managed all aspects of the company's fundraising, including individual, corporate, and foundation giving. I worked at KQED for approximately five years. Prior to working at KQED, I was a management consultant at

KPMG/Peat Marwick in New York City for approximately two years. I hold an MBA degree (with emphasis in marketing and public management) from Stanford University, Stanford, California, and a BA degree from Columbia College, Columbia University in New York, New York. During the 1987-1988 academic year, I was a teaching associate for the Strategic Management for Nonprofit Organizations course, offered as part of the Public Management Program curriculum at the Stanford Graduate School of Business. In connection with my experience at Stanford Graduate School of Business, I authored *KQED - TV San Francisco*, a case study for the Stanford Graduate School of Business curriculum.

3. The opinions expressed below are based primarily on the knowledge and experience I have gained in connection with the positions I have held at PBS, KQED, and KPMG/Peat Marwick. This includes numerous contacts I have had over the years with fundraising personnel at public television stations around the country. In addition, I have consulted certain data from PBS files and other sources and made certain computations based on those data, as indicated below. Where appropriate, I have cited the source of my information. I am generally aware of the expert opinions that Mr. M. Peter Downey and Dr. Roger Noll intend to express concerning public television stations in this case, and I believe my opinions are consistent with, and supportive of, their views.

#### *Summary of Expert Opinion*

4. The ability of a public television station to meet its operating expenses and deliver quality programming and other services to its local community depends in large part on voluntary contributions from its viewers and support from corporate underwriting and foundation grants. The present pressure to reduce the government funding provided to public television

through the Corporation for Public Broadcasting ("CPB") increases the importance of individual contributions, corporate underwriting, and foundation grants to the financial health of individual public television stations. As the federal appropriation for CPB decreases, other sources, particularly viewer contributions and corporate and foundation underwriting, must fill the gap. Accordingly, now more than ever public television stations' financial stability depends on their continued ability to obtain alternative sources of funding from individual contributions, corporate underwriting, and foundation grants.

5. One of the most critical factors in determining whether a station is successful in obtaining such viewer contributions and corporate and foundation support is the station's access to viewers. To the extent a station's ability to reach its viewers is denied or diminished -- either by the unilateral actions of a cable operator or otherwise -- the ability of a station to meet its operating expenses and service its local community would be severely jeopardized.

6. While it may be difficult to accurately quantify the exact amount of financial harm to public television stations resulting from lost access to viewers, it is possible to develop a model that would provide an estimate of the potential viewer contributions lost. Such a model would provide an indication of the potential level of one type of financial harm to public television stations that might have resulted from lost access to viewers in the past. More important, such a model would provide a means for predicting the potential magnitude of harm to public television stations that might result from lost access to viewers in the future.

## *I. Voluntary Contributions From Viewers*

### *A. Voluntary Contributions Are An Important Source of Funding*

7. Donations from individual viewers, who have access to a station's service, have become an increasingly important funding source for public television stations. Individual donations include station membership revenue, contributions from non-members, major gifts, bequests, planned gifts from individuals, and auction revenue. Today, such viewer donations constitute public television's single largest revenue source. For example, based on data compiled by CPB, individual contributions to public television for fiscal year 1992 totaled more than \$316 million, which constituted more than 22.8 percent of the financial support for public television stations from all sources for that fiscal year. A copy of the relevant page of the CPB report is attached hereto as Exhibit A.

8. Individual donations generally provide the most stable and reliable income to public television stations. Based on the revenue activity of station contributions as reported to PBS through the years, approximately one-third of a public television station's contributor base consists of viewers who have renewed their support during three or more consecutive years. Retaining these long-term donors is critical to a public television station's financial health. Because the per-member cost of acquiring new members is substantially greater than the cost of retaining existing members, public television development professionals build their station's fundraising margin on the retention of long-term donors. Accordingly, the successful establishment of long-term, donor relationships depends on the public television station's ability to continue providing donors with the type of program service they have supported in the past. See various PBS Development Reports that have been produced in this



case. See also PBS, *Life Time Value of Membership: A Model for Analyzing Membership Strategies and Techniques* (July 1993).

***B. Voluntary Contributions Require Access to Viewers***

9. A public television station's ability to obtain donations from individuals and sustain contributions from retained members depends primarily on the station's access to viewers. An individual who cannot watch a public television station usually has little incentive to support it financially. Certainly, individuals without access to a public station will not receive messages broadcast by the station regarding pledge drives, auctions, and other fundraising events.

10. Thus, while the operating circumstances and revenue sources of individual public television stations may differ, each station's ability to maintain or increase the revenue it derives from individual contributions is dependent upon the number of potential viewing households to which it has access. For example, assuming a public television station had access to only ten viewing households in a community, its potential to generate financial support from its viewers would, by definition, be limited to those ten households. If the public television station's access were expanded to 100 viewing households, its target contributor base would increase ten-fold.

11. Based on the foregoing, if a public television station loses access to a given number of households, it can be predicted with reasonable certainty that the station will lose a number of viewers and, hence, individual contributions from those viewers. While it may be difficult to accurately quantify such lost contributions at any given point in time, the lost contributions are very real for the individual station affected and could be very significant if that station experiences a considerable loss of viewer access to its signal. As indicated by CPB revenue figures produced in this litigation, many public

television stations have small operating budgets; a loss of even a few thousand dollars in individual donations could have a significant negative effect on that station's operations or could impair the station's ability to maintain -- let alone expand or improve -- its programming.

*C. Cable Drops and Shifts Result in Lost Viewership Contributions*

12. Based on numerous discussions with fundraising professionals at many public television stations and my own experience at KQED, it is my expert opinion that a station would likely experience a loss in individual contributions as a result of an adverse action by a local cable operator. Such adverse actions include shifting the channel on which the public television service is received or dropping the station from the cable system altogether.

13. Specifically, a drop from a cable system would ordinarily result in a loss in viewers' access to the public television station, which in turn would likely result in a diminution in contributions to the station. While there may be some cable subscribers who are willing and able to overcome substantial obstacles to receiving their local public television station off the air, it is my experience and understanding that, as a practical matter, cable subscribers are often disinclined to view any television station that is not carried on their cable system. Similarly, a channel shift may result in viewer confusion leading to viewership loss, which in turn would affect individual contributions.

14. Accordingly, any such adverse action by a cable operator would disrupt the public television station's relationship with subscribers who are long-term donors and on whose loyalty the station relies to ensure a steady, predictable level of community support that stabilizes its operating income year to year. Over time, the value to a station of each of these contributor relationships could total hundreds of dollars per household.

15. The cumulative effect of a series of small revenue losses at individual public television stations is to deprive the public television system as a whole of resources it might otherwise have used to increase the amount or quality of programming produced on a national level.

***D. Model of Potential Dollar Contributions Lost Per Household***

16. Because access to households is a necessary component of viewership contribution, it is possible to create a model that would approximate, at the national level, an average range of annual dollar contributions per household that has access to public television ("Model"). Such an average would provide an estimate of the potential annual dollar amount of contributions represented by each household that has access to a public television station. By inputting the total number of households to which a public station is denied access as a result of cable drops (or other adverse cable action), it would be possible to utilize the Model to estimate the potential total dollar amount of contributions lost.

17. In constructing such a Model, it would be appropriate to include average figures for at least the following three components:

- a. of the number of households that have access to a public television station, the percentage that would actually view the public television station ("Viewership Percentage");
- b. of those who view a public television station, the percentage that would actually make a voluntary contribution ("Contribution Percentage"); and
- c. the average annual dollar amount of contribution per contributor ("Average Contribution").

18. Viewership Percentage. In general, a significant percentage of households that receive a public television station's signal will view that signal.

[REDACTED]

19. Contribution Percentage. Of the viewers of a public television station, a certain percentage will contribute money to a public television station. Based on data available, the percentage of contributing viewers ranged from a national average of approximately 8.3% in fiscal year 1985 to approximately 10.1% in fiscal year 1992. These percentages have improved in the last decade because of improvements in fundraising techniques. A copy of the underlying calculations is attached hereto as Exhibit C.

20. Average Contribution. Based on data available, it is possible to calculate the Average Contribution. Over time, the Average Contribution has

also increased from an average of \$46.15 per contributor in fiscal year 1985 to \$56.51 in fiscal year 1992. A copy of the underlying documents and calculations supporting these figures is attached hereto as Exhibit D.

21. Multiplying these three components -- Viewership Percentage, Contribution Percentage and Average Contribution -- would yield a range of averages that represent the dollar contribution per household that has access to a public television station. For the period from fiscal year 1985 to fiscal year 1992, the approximate ranges of average dollar contributions per household were as follows:

| Fiscal Year | Approximate Range of Average Contributions Per Household |
|-------------|--|
| 1985        |  |
| 1986        | [Redacted]   |
| 1987        |  |
| 1988        |  |
| 1989        |  |
| 1990        |  |
| 1991        |  |
| 1992        |  |

***E. Lost Access to Viewers Results in Loss of Potential Dollar Contributions***

22. By applying these approximate ranges of average dollar contributions per household, the Model could be used to illustrate the potential magnitude of the amount of dollar contributions lost as a result of lost access to viewers. This would be accomplished by inputting the number of households

lost and multiplying this number by the approximate range of average contributions lost per household.

23. To illustrate, I have been provided with data compiled by Cable Data Corporation that I understand represents the number of subscribing households to cable systems that dropped certain local public television stations that had been previously carried during all or a part of the fiscal years 1985 through 1992 ("Cable Drops"). Because each cable system has a certain number of households that subscribe to its service, each Cable Drop means that the station dropped was denied access via cable to the number of cable households subscribing to that cable system.

24. For example, in fiscal year 1992, public television stations that were within 50 miles of their respective cable system's headend were apparently denied access to approximately 9,125,511 cable households as a result of Cable Drops.<sup>1</sup> Applying the approximate ranges of average contributions per household lost, it appears that the aggregate dollar contributions to public television stations that were potentially lost in fiscal year 1992 as a result of Cable Drops were in the range of approximately \$6,406,325 to approximately \$26,771,148. A summary of the range of potential losses in contributions resulting from Cable Drops for the period from fiscal year 1985 to fiscal year 1992 is as follows:<sup>2</sup>

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<sup>1</sup> Because the Model applies only to stations that solicit viewership contributions, I have not included the number of subscribing households lost by WNYE as a result of cable drops because WNYE is among a handful of public television stations that do not solicit viewership contributions and are therefore unrepresentative of typical public television stations.

<sup>2</sup> A more detailed breakdown of this summary is attached as Exhibit E.

| Fiscal Year | Approximate Number of Potential Cable Households Lost | Approximate Range of Average Contribution Per Cable Household Lost | Approximate Range of Potential Contributions Lost |
|-------------|---|--|---|
| 1985        | 1,194,143   |  |   |
| 1986        | 1,962,199   |  |   |
| 1987        | 3,882,873   | [Redacted]   | [Redacted]  |
| 1988        | 5,159,001   |  |   |
| 1989        | 5,912,889   |  |   |
| 1990        | 7,131,615   |  |   |
| 1991        | 8,096,411   |  |   |
| 1992        | 9,125,511   |  |   |

25. I emphasize that these numbers simply illustrate the range of potential total dollar contributions that could have been lost as a result of Cable Drops in the period from fiscal year 1985 to fiscal year 1992. The actual dollar amount – if such a figure could ever be ascertained precisely – may fall around the low or high end of these ranges or somewhere in between, depending on a number of different factors. For example, if a particular set of stations that are dropped by cable systems happen to have relatively low Viewership Percentages, the approximate average contribution per cable household lost would fall within the lower end of the range of the Model, thereby yielding a lower estimate of the total amount of dollar contributions lost. Conversely, if the dropped stations as a group have relatively high Viewership Percentages, the approximate average contribution per cable household lost would fall within the higher end of the range, thereby yielding a higher estimate of the total amount of dollar contributions lost.

26. Further, as noted above, the foregoing estimated ranges of potential contributions lost are a measure of only *one* form of potential financial harm to public television stations as a result of Cable Drops. As discussed below, access to viewers is necessary to other forms of fundraising for public television stations, such as corporate underwriting and foundation grants. Moreover, even those stations that do not rely as heavily on viewer contributions are dependent on access to viewers to justify the operating support they receive from other sources. In order to more accurately quantify the magnitude of potential harm, it would be necessary to include additional measures of financial harm resulting from lost access to cable subscribers.

27. Further, the use of data on only Cable Drops may understate the potential magnitude of harm to public television stations, because such data does not take into account an additional number of public television stations that may have been entitled to carriage but were never carried by the cable system ("Cable Non-carriages"). To illustrate the potential magnitude of such Cable Non-carriages, I have been provided with data, also compiled by Cable Data Corporation, that I understand includes both Cable Drops and Cable Non-carriages. Using the same percentages employed in the prior analysis for Cable Drops alone, the combined loss in potential contributions for fiscal year 1992 (when instances of Cable Non-carriage are included) ranged from

[Redacted] A summary of the potential loss in contributions resulting from both Cable Drops and Cable Non-carriages for the period from fiscal year 1985 to fiscal year 1992 is as follows:<sup>3</sup>

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<sup>3</sup> A more detailed breakdown of this summary is attached as Exhibit F.



| Fiscal Year | Approximate Number of Potential Cable Households Lost | Approximate Range of Average Contribution per Cable Household Lost | Approximate Range of Potential Contributions Lost |
|-------------|---|--|---|
| 1985        | 12,532,350  |  |   |
| 1986        | 14,145,283  |  |   |
| 1987        | 17,606,467  | [Redacted]   | [Redacted]  |
| 1988        | 22,664,024  |  |   |
| 1989        | 26,176,244  |  |   |
| 1990        | 29,080,055  |  |   |
| 1991        | 31,737,216  |  |   |
| 1992        | 34,346,742  |  |   |

28. As discussed above, it is important to note that the foregoing numbers simply illustrate the range of potential total dollar contributions that could have been lost as a result of Cable Non-carriages for the period from fiscal year 1985 to fiscal year 1992. The actual dollar amount – if ascertainable – may fall near the low or high end of the ranges or somewhere in between, depending on the Viewership Percentages of the stations that were not carried and other factors. Further, if the number of subscribers represented by the Cable Non-carriages had been lower, then the approximate range of potential dollar contributions would be correspondingly lower. Conversely, if the number of subscribers represented by the Cable Non-carriages had been higher, then the approximate range of potential dollar contributions would be correspondingly higher.

29. Nevertheless, as discussed above, the use of the Model provides a measure of only *one* form of potential financial harm to public television stations resulting from lost access to viewers. The Model does not reflect other losses of potential revenue resulting from Cable Drops and Non-

carriages. In that respect, the Model may even *understate* the amount of financial harm to public stations that could result from Cable Drops and Non-carriages.

## *II. Corporate Underwriting and Foundation Grants*

30. Underwriting and other forms of support provided by businesses and foundations are also an important source of funding for public television stations. In fiscal year 1992, corporate underwriting and business support of public television programming totaled almost \$232 million. This constituted almost 17 percent of the financial support for public television from all sources in fiscal year 1992. The data underlying these figures are contained in the relevant page of the income report generated by CPB, a copy of which is attached hereto as Exhibit A.

31. As with individual contributions, the ability of a station to obtain underwriting and other business support depends largely on the station's access to audiences. In particular, a local business is more likely to provide support if the station is widely carried or easily received on the major cable systems in its locality. Similarly, a national business is more likely to provide support if a station's signal reaches a large number of cable households. A corporate underwriter may also consider the quality or quantity of service offered by a particular station.

32. Based on my discussions with fundraising professionals at many public television stations, my knowledge of the experience of station personnel, and my own experience at KQED, it is my expert opinion that a station's ability to attract corporate underwriting support or foundation grants is likely to be adversely affected by drops and shifts by cable operators. Because such drops and shifts would result in the loss of access to audiences, the station's ability to attract corporate underwriting would be jeopardized. Specifically,

based on my discussions with numerous corporate donors at the local level, it is my view that the opportunity to underwrite a public television station's programming becomes significantly less attractive to a local business if a substantial number of households in the community cannot view that programming. A local cable system's refusal to carry the public television station reduces the potential audience for the station's programming and, therefore, is likely to lead a business to conclude that it would not be worthwhile to underwrite that programming.

33. The cumulative effect of a series of decisions by local cable operators not to carry local public television stations is to diminish the ability of the public television system as a whole to obtain underwriting for programs distributed nationally by PBS. Based on my discussions with national producers who seek national underwriting support, I am aware that a national underwriter will be disinclined to provide underwriting for programming that does not have the prospect of reaching a substantial audience that fits into a national profile. The size of the potential national audience is limited by the number of viewers who have access to a nationally distributed program, including those whose access is primarily or solely by cable.

34. The fact that two or more public television stations serve the same geographical area does not necessarily diminish the fundraising opportunities for each of those stations. Where several public television stations serve the same area, they tend to fill separate niches. For example, the second or third station serving an area may emphasize instructional programming or programming oriented toward a particular racial or ethnic minority group. To some extent, the stations will reach out to different groups of individuals in their fundraising efforts.

35. Even when two "mainstream" public television stations are available in an area, many individuals view both stations and make financial contributions to both. This was my experience in Northern California, where public television stations KQED and KTEH both provide a general audience service to the peninsula and south bay communities around San Francisco. During my tenure at KQED, it was my experience that both stations successfully forged loyal relationships with viewers and contributors. The two public television services offered distinct emphases to appeal to different audiences at different times. For example, KQED broadcast classical music and dance performance programs more frequently than KTEH, which emphasized science fiction and fantasy programs, as well as contemporary music programs that appealed to a loyal and appreciative audience. Informal research conducted by KQED indicated that some viewers recognized the distinctiveness of each service and supported both stations, and that each station also had a distinctive group of supporters.

#### *Conclusion*

36. Based on the foregoing, it is my expert opinion that, during the period from fiscal year 1985 to fiscal year 1992, unilateral drops and shifts by cable operators have resulted in substantial financial harm to individual public television stations in terms of losses in potential viewer contributions. It is also likely that loss of access to public television viewers served by cable resulted in lost corporate underwriting and foundation grants. Absent must carry legislation, any future unilateral drops and shifts by cable operators would likely result in further financial harm to public television stations.

37. In conclusion, it is my view that, by assuring that public television stations will continue to have access to potential viewers served by

cable, must carry legislation serves an important public interest in maintaining the financial viability of public television stations and the public broadcasting system as a whole.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 25, 1995.

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JONATHAN C. ABBOTT

## INDEX TO EXHIBITS

|           |  |
|-----------|--|
| Exhibit A | Public Television Revenue FY 1991-1992   |
| Exhibit B | Average Percent of Households Viewing<br>Public TV for the Top- and Bottom-Ranked<br>[Redacted]                                      |
| Exhibit C | Calculation of Percent of Public TV<br>Viewing Households that Contribute  |
| Exhibit D | Public Television Viewer Support FY 1980 to<br>FY 1992   |
| Exhibit E | Analysis of Potential Amount of<br>Contributions Lost from FY 1985<br>to FY 1992 Based on Cable Drops<br>(Excludes WNYE)             |
| Exhibit F | Analysis of Potential Amount of<br>Contributions Lost from FY 1985<br>to FY 1992 Based on Drops and<br>Non-Carriages (Excludes WNYE) |

## ***Public Television Revenue***

**FY 1991-FY 1992**

(in thousands of dollars)

| <b><i>Sources</i></b>                              | <b><i>FY 1991</i></b> | <b><i>FY 1992</i></b> | <b><i>Percent<br/>of Total</i></b> | <b><i>Percent<br/>Change</i></b> |
|--|-----------------------|-----------------------|------------------------------------|----------------------------------|
| <b><i>Tax-Based Support</i></b>                    |                       |                       |                                    |                                  |
| Corporation for Public Broadcasting                | \$177,914             | \$184,507             | 13.3%                              | 3.7%                             |
| Federal Grants & Contracts                         | \$72,684              | \$99,587              | 7.2%                               | 37.0%                            |
| <b><i>Federal Support</i></b>                      | <b>\$250,598</b>      | <b>\$284,094</b>      | <b>20.5%</b>                       | <b>13.4%</b>                     |
| Local Governments                                  | \$50,305              | \$51,650              | 3.7%                               | 2.7%                             |
| State Governments                                  | \$255,182             | \$228,825             | 16.5%                              | -10.3%                           |
| State Colleges & Universities                      | \$86,632              | \$89,838              | 6.5%                               | 3.7%                             |
| Other Public Colleges & Universities               | \$12,258              | \$11,558              | 0.8%                               | -5.7%                            |
| <b><i>State &amp; Local Government Support</i></b> | <b>\$404,377</b>      | <b>\$381,887</b>      | <b>27.6%</b>                       | <b>-5.8%</b>                     |
| <b><i>Total Tax-Based Support</i></b>              | <b>\$654,975</b>      | <b>\$665,961</b>      | <b>48.1%</b>                       | <b>1.7%</b>                      |
| <b><i>Private Support</i></b>                      |                       |                       |                                    |                                  |
| Private Colleges & Universities                    | \$14,790              | \$12,250              | 0.9%                               | -17.2%                           |
| Foundations  | \$56,208              | \$65,967              | 4.8%                               | 17.4%                            |
| Businesses   | \$229,967             | \$232,597             | 16.8%                              | 1.1%                             |
| Subscribers  | \$285,852             | \$298,046             | 21.4%                              | 3.6%                             |
| Auctions   | \$20,083              | \$20,163              | 1.5%                               | 0.4%                             |
| All Other Private                                  | \$81,768              | \$91,677              | 6.6%                               | 12.1%                            |
| <b><i>Total Private Support</i></b>                | <b>\$688,666</b>      | <b>\$718,700</b>      | <b>51.9%</b>                       | <b>4.4%</b>                      |
| <b><i>Total, All Sources</i></b>                   | <b>\$1,343,643</b>    | <b>\$1,384,661</b>    | <b>100.0%</b>                      | <b>3.1%</b>                      |

*Note: Columns may not add due to rounding.*

*Source: CPB*

**Exhibits B & C Redacted.**



**Public Television Viewer Support  
FY 1980 to FY 1992**

|      | <b>Contributions<br/>(\$ mil)</b> | <b>Number of<br/>Members<br/>(mil)</b> | <b>Average<br/>Contribution</b> |
|------|-----------------------------------|--|---------------------------------|
| FY80 | \$77.9                            | 2.6                                    | \$29.96                         |
| FY81 | \$102.4                           | 2.9                                    | \$35.31                         |
| FY82 | \$111.8                           | 3.3                                    | \$33.88                         |
| FY83 | \$147.0                           | 3.5                                    | \$42.00                         |
| FY84 | \$160.0                           | 3.8                                    | \$42.11                         |
| FY85 | \$180.0                           | 3.9                                    | \$46.15                         |
| FY86 | \$200.2                           | 4.2                                    | \$47.67                         |
| FY87 | \$230.2                           | 4.7                                    | \$48.98                         |
| FY88 | \$240.5                           | 4.7                                    | \$51.17                         |
| FY89 | \$262.0                           | 5.2                                    | \$50.38                         |
| FY90 | \$269.9                           | 5.2                                    | \$51.90                         |
| FY91 | \$278.0                           | 5.1                                    | \$54.82                         |
| FY92 | \$291.0                           | 5.2                                    | \$56.51                         |

**Exhibits E & F Redacted.**

DOMNEY

IN THE UNITED STATES DISTRICT COURT  
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Civil Action No. 92-2247 (and  
Consolidated Cases Civil Action  
Nos. 92-2292, 92-2494,  
92-2495, 92-2558)  
(SFW, TPJ, SS)

**DECLARATION OF M. PETER DOWNEY**

1. I am M. Peter Downey, and I hold the position of Senior Vice President of Program Business Affairs for the Public Broadcasting Service ("PBS"). In that position, I supervise PBS's contracting process with program producers and the monitoring of producers' compliance with PBS's administrative policies. I have held the position of Senior Vice President with responsibility for Program Business Affairs since 1980.

***Background and Expert Qualifications***

2. Prior to joining PBS, I spent 13 years in a variety of production-related positions at WGBH, a public broadcasting organization in Boston, Massachusetts. This included five years as a television producer-director, followed by eight years as Operations Manager for all of WGBH's film, television and radio production, and engineering operations.

3. I joined PBS in 1977 as Director of Operations and was responsible for managing the operational aspects of PBS's transition from terrestrial to satellite distribution of public television programming. In mid-1978, I was elected Senior Vice President for Corporate Affairs and served as principal management liaison to the PBS Board of Directors. In 1980, I was given responsibility for a variety of program support activities, including program scheduling, management of PBS's program purchasing mechanism (the Station Program Cooperative), contracting with program providers, and managing various administrative policies related to the acceptance and distribution of programming.

4. Since 1980, I have, from time to time, supervised a number of additional PBS departments and activities, including advertising, promotion, corporate information, development, computer services, audience research, corporate administration, conference services, personnel, program data and analysis, and PBS Enterprises (PBS's for-profit subsidiary). Over the past seventeen years, I have played a significant role in numerous PBS policy and business initiatives, including: supervision of two different PBS cable program service initiatives (1980 and 1990); design and introduction of a new PBS corporate logo and corporate identification system (1984); several proposals for a PBS national advertising effort (1984-1986); development of new National Program Funding Standards and Practices (1987); development of new On-Air Offers Policies (1989); development of a new program management structure and pricing system (1988-1990); new producer contracting policies (1994); and numerous other corporate strategic plans and initiatives. In the course of my thirty-plus years of service in the public television industry, I have gained extensive knowledge of most aspects of

public television, including programming, station and PBS operations, cable relations, viewership and membership patterns, and systemwide economic and strategic issues. In addition, I have become familiar with the objectives of public television and the ways in which public television's performance and achievements are ordinarily measured.

5. In my seventeen-plus years at PBS, I have authored dozens of intra-system white papers intended to describe and advance particular PBS policy and operational initiatives. I also collaborated in the writing of, and am the subject of, a Harvard Business School Case Study that examines "The PBS National Advertising Plan" that I advanced in the mid-1980's.<sup>1</sup> In 1986, I authored a "Public Television Financial Abstract" for the PBS Board of Directors that detailed the macroeconomics of public television and laid the foundation for a transition four years later to a more centralized form of programming for public television. In 1988, I was the principal author of "PBS's Strategic Plan for the 1990's."

6. In my current capacities, I am called upon frequently as PBS's spokesperson on a variety of subjects including system finances, relations with cable, relations with corporate and foundation underwriters, PBS's contracting practices, PBS's policies with respect to ancillary income from program-related activities, and similar matters. In August 1993, I submitted testimony to the U.S. Copyright Royalty Tribunal (Docket 92-1-90CD); in December 1989, I testified before the Copyright Board of Canada in the Matter of Royalties for Retransmission of Distant Radio and Television Signals to become effective January 1, 1990.

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<sup>1</sup> The PBS National Advertising Plan; Harvard Business School Case Study #0-587-152; Teopaca, John L. and Greyser, Stephen A.; © 1987, President & Fellows of Harvard College.

7. The opinions expressed below are based primarily on the knowledge and experience I have gained in connection with the many positions I have held at PBS and WGBH. In addition, I have consulted certain data and various studies, as indicated below. Where appropriate, I have cited the source of my information. I am also aware of the expert opinions that Jonathan C. Abbott and Dr. Roger Noll intend to express concerning public television stations in this case, and I believe my opinions are consistent with, and supportive of, their views.

***Public Television Objectives:  
Public Service, Universal Access, and Diversity***

8. Public television is a not-for-profit business whose objective is public service, not private gain. The mission of public television is to provide quality programming and services to all Americans. The value of public television, therefore, cannot be measured in commercial marketplace terms. For public television, *every* viewer is important.

9. Local public television stations strive to fulfill the mission of public television by serving the diverse needs within their communities. For example, in addition to all those who benefit from public television's general services for audiences, an estimated 29.5 million school children attending approximately 70,000 schools now have daily access to public television's instructional programming services. Public television is the number one resource for classroom programming in the country, and these instructional services are used by nearly 2 million teachers. Public television also provides college telecourses for more than 325,000 degree-candidates each year. *See* Exhibit A to this Declaration.

10. Given public television's mission, the use of Nielsen ratings, for example, to measure the "worth" of public television would be wholly inappropriate. To illustrate, if all 325,000 degree-candidates were to view the same episode of a telecourse at the same time, [Redacted]

Judged by commercial standards, such a program would not survive. However, in public television, such a program would continue to be aired in order to serve the needs of the 325,000 degree-candidates.

11. Universal access is central to public television's mission. As Congress declared in The Public Broadcasting Act of 1967, public television services should be "available to all citizens of the United States." 47 U.S.C. § 396(a)(7). To help make its programming and services universally accessible, public television has been the leader in providing closed captioning for the hearing impaired, descriptive video service for the visually impaired, and foreign language programming, for example.

12. Consistent with the congressional policy of universal access, the Federal Communications Commission ("FCC") has allocated a portion of the broadcast spectrum to noncommercial educational television stations (commonly referred to as "public television stations") and required that those stations furnish a "non-profit and noncommercial broadcast service." 47 C.F.R. § 73.621. This has enabled the establishment of approximately 350 community-based stations that provide public broadcasting service to their respective communities.

13. Public television is also founded on the principle of diversity. 47 U.S.C. § 396(a)(5). Each public television station endeavors to provide programming that will serve diverse needs of viewers within the community



to which it is licensed, particularly those who are unserved or underserved, such as minorities and children. Public television stations are operated and controlled by local institutions, and each station's programming choices and scheduling decisions are made entirely by that station. Where two or more public television stations serve the same community, they have been established to serve different community needs and they offer services that are not duplicative of one another. It is therefore untrue that "PBS" stations are all alike; rather, there are vast differences between and among the programming and other services provided by overlapping public television stations -- perhaps more so than between and among commercial network affiliates. Attached as Exhibit B to this Declaration is a list of all of the second, third, and fourth PBS member stations in major markets and the special program niches they fill.

14. Even in the Washington, D.C. area, a unique market reached by five public television stations, each station targets its services to different audiences and seeks to provide a unique service to meet the needs of its respective audiences: (i) WETA, the largest of the five, offers mainstream PBS programming to a general audience; (ii) WHMM, licensed to Howard University, offers programming oriented to African-American audiences; (iii) WNVC offers an "international" service with a broad variety of foreign language programming for international expatriates; (iv) WNVT, the sister station of WNVC, offers primarily instructional television services; and (v) WMPT/Annapolis, one of several transmitters owned and operated by Maryland Public Television, provides many programs with a focus on Maryland.

15. Furthermore, to the extent the same PBS programs are available to these stations, PBS's membership and financial policies strongly encourage public television stations in the same market to schedule the same programs at different times ("time-shift"). To illustrate, in the greater Los Angeles area, there are four public television stations: KCET, a community institution, provides a general audience service; KLCS, operated by the Los Angeles Unified School District, distributes instructional television programming to Los Angeles County public schools; and KVCR/San Bernardino and KOCE/Huntington Beach, both licensed to community colleges, distribute college telecourses for degree-seeking students. In addition to having differentiated services, these stations' program schedules are very different from one another and avoid the simultaneous broadcast of duplicative programming.

16. It is my expert opinion that *any* action that diminishes a local public television station's access to its intended audience would frustrate clear congressional policies of universal access and diversity, and would inhibit the public television station's ability to fulfill its public service mission. The loss of any station in a market diminishes the accessibility and diversity of public television programming available to all viewers in that market. Thus, wholly apart from any financial consequences, the diminution or denial of access harms public television stations and the public they are licensed to serve.

***The Importance of Cable in Meeting Public Television's Objectives***

17. Public television has long been dependent on cable carriage to achieve its objectives and, in particular, universal access. This is because cable carriage overcomes the signal reception problems that handicap viewers'

access to public television stations. Approximately two-thirds of public television stations operate in the UHF band. See Exhibit C to this Declaration. Based on my experience and observations as head of engineering operations for WGBH, WGBX and WGBY in Massachusetts (channels 2, 44 and 57, respectively), I can affirm that UHF stations are at a significant disadvantage relative to VHF stations, and that this phenomenon particularly disadvantages public television.

18. Other things being equal, the quality of the UHF signal that is receivable in a community is inferior to that of the VHF signals. While, to some extent, these UHF/VHF differences could be mitigated by operating UHF stations at the highest permissible power level (500,000 watts of Effective Radiated Power), relatively few public broadcasters operate at this ERP level because it is difficult for a non-profit, noncommercial institution to justify the benefit of the additional reach against the extremely high energy costs .

19. Cable also enables public television to overcome problems with poor signal quality. In particular, public television stations suffer from the fact that their transmission towers are often situated well away from the commercial towers serving the same community. This is sometimes the result of unaffordable land costs, or because the public television station is attempting to cover a whole region or state rather than a particular city. The consequence is ~~that~~ viewers' antennas are often oriented in another direction, thus diminishing the signal quality available to them.

***Loss of Cable Carriage Results  
In Loss of Viewers of Public Television***

20. Based on discussions with public television station personnel over the years, I am aware that a cable system's failure to carry a local public

television station results in loss of viewership for that station. If a cable system drops a public television station, by definition, the system's subscribers can no longer receive the station's signal through the cable. Depending on the strength of the station's signal, local terrain features, the existence of an outdoor antenna, its azimuth and elevation, the quality of the lead-in wire, the quality of the UHF tuner in the viewer's TV set, and other factors, a subscriber may be able to receive a "dropped" station's signal over the air. Based on the experiences of public television stations that have been dropped from cable systems, however, it appears that most cable subscribers either cannot or will not switch back and forth between their cable service and their antenna. In any event, depending on the quality of the over-the-air signal at the viewer's home, the benefit of an A/B switch may be marginal.

21. Based on discussions with public television station personnel over the years, I am aware that involuntary repositioning of a public television station from one channel to another on a cable system is likely to lead to a loss of viewers for the station. Virtually all public television stations identify and promote themselves within the community by their channel number. For the public, the "name" of a station is often the channel number on which viewers are accustomed to receiving such station. Any change in channel position on the cable system is a change of "address" that confuses viewers and can negate all the time and money the station has invested in building its local identity -- through print and on-air promotion, through the creation of logos or other graphic materials that use the channel number, and so forth. Further, if the public television station is shifted to a different channel (usually higher), viewers will be less likely to tune in, because of the lack of proximity to popular commercial network stations.

22. The problem of shifts is further exacerbated if the shift is to a channel that is so high that a cable subscriber cannot receive that channel without a "converter box." Many subscribers will be reluctant to purchase or lease this additional equipment, and some may be unfamiliar with it or unaware of its availability. Even if cable companies provide their customers with the necessary physical equipment, these companies may not necessarily install it.

23. Thus, the subscriber may need to overcome a number of obstacles in order to receive a public television signal on its new channel, assuming the cable subscriber even knows where to find the public television station. The station may be required to spend time and considerable resources on a promotion campaign to publicize its new channel location (or to obtain a reversal of the channel switch). Even when such campaigns are successful, the station is still likely to experience an extended loss of viewership until subscribers resolve their confusion and adjust to the new (or restored) channel location.

***Loss of Cable Carriage Results in Harm to  
Public Television's National and Local Programming***

24. As the Declaration of Jonathan C. Abbott explains, a station's loss of access to viewers due to cable drops and shifts will result in a loss of membership revenue and other forms of financial support for the public television station's service. This would have a direct adverse effect on the public television station's programming or other services.

25. To further the objectives of public service, universal access and diversity, public television stations must be able to meet their operating expenses. Whatever the mix of funding on which a particular public

television station relies, any substantial loss of funds from any source diminishes that station's revenue base and strains its ability to provide high quality programming and other services. A station's programming budget is more sensitive to financial reversals than almost any other station activity. This is because basic station operations represent the station's fixed costs, while programming is treated as a variable cost. Thus, when a station experiences marginal increases or decreases in revenues, the compensating adjustments are typically made in the station's programming budget. The significance is that any diminution in revenues -- arising from a cable drop, for example -- will most likely translate to a dollar-for-dollar reduction in programming budgets, and thus a direct diminution in the volume (and/or quality) of the programming provided by the station.

26. Moreover, revenue reductions are often "passed along" to PBS in the form of reduced station participation in the funding of the PBS National Program Service ("NPS"). As a direct result, the quality and quantity of programming distributed nationally by PBS to all public television stations is likely to be reduced, and this results in harm to all stations and their respective viewers.

27. Specifically, the programs made available by PBS through the NPS are a significant part of the programming that most public television stations offer. These NPS programs are financed in part by PBS's member stations. Prior to 1992, most NPS programs were acquired by stations through a member cooperative where the costs of each purchased program were apportioned among the stations that acquired that particular program. In 1992, the member cooperative was abandoned in favor of a delegation of spending authority to a chief program executive at PBS. Under this new

approach, the chief program executive decides which programs to acquire and distribute. Stations still pool their resources under this approach, but they now pay for a "programmed service" rather than individual programs. In both cases, however, it is the aggregation of funds from all stations that makes it possible for PBS to obtain programming, and the stations' contributions are leveraged so that, currently, an annual station investment of approximately \$90 million yields \$250 million to \$300 million worth of NPS programming. PBS's ability to acquire high-quality productions for the NPS depends on the amount of money that public television stations are collectively able to aggregate for national programming, which in turn depends on their individual station revenues. Accordingly, the quality and quantity of NPS programming is related directly to the ability of each public television station to pay for it.

28. A reduction in revenues will also injure a station's ability to acquire programming from sources other than PBS. Most stations produce some amount of local programming, and they also acquire programming from regional public television networks and from commercial sources. The decision as to what programming to produce and/or acquire (including what amount of PBS programming to acquire) rests with the local station. Almost all public television stations subscribe to the NPS, but they pick and choose among the available programs, based on local considerations.

29. As noted above, due to the cooperative financing mechanism for PBS programming, if some public television stations lose significant revenue as a result of adverse cable carriage actions, there will be a ripple effect on the programming available to all stations. Because reduced contributions from those stations diminish the overall pool of funds available for the NPS, all

public television stations lose access to a certain amount of programming, or the quality of the programming drops, or both. If the quantity and/or quality of public television programming drops, it then becomes more difficult to attract viewers, donations, and underwriting, and this harms the entire public television system.

### *The Need for Must Carry Regulation*

30. During the 1985 to 1992 period, I did not have responsibility for collecting information on adverse (or beneficial) cable actions involving public television stations and therefore did not personally maintain a systematic count of the numbers of cable drops and shifts. However, in the course of my conversations with public television station managers during this period, I became aware that there was considerable concern about the fact that cable systems had dropped some stations or shifted the channel of others. Particularly during the period from 1985 to 1988, it seemed that I was learning, on a daily basis, about new drops and shifts and the detrimental effects resulting therefrom. The apparent mounting numbers of such drops and shifts stations were creating considerable turmoil in the public television industry.

31. Moreover, based on my conversations with station managers, it appeared that there was a pattern of drops and shifts, and this was alarming. Specifically, during the 1985 to 1988 period, I became aware of instances where, over a relatively short period of time, several stations on cable systems owned by some of the nation's largest multiple system operators ("MSOs") had experienced unannounced drops. This posed a serious threat to any station carried by that MSO. Thus, even though a station that was being



carried by that MSO was not ultimately dropped, the constant *threat* of a drop was disturbing to that station.

32. Further, it was a widely-held belief in the public television industry that the cable industry may have been on its "best behavior" during the late 1980s and early 1990s when Congress and the FCC were actively considering new must-carry legislation. Whatever the total number of drops and shifts may have been during this period, I believe that considerably more drops and shifts would have occurred absent the prospect of must carry legislation. Indeed, I and my public television colleagues believe that, absent any must-carry regulation, cable operators would feel free to drop and shift public television stations whenever it suited their economic interests. This would result in significant injury to public television stations, particularly those that are the second and third stations in a market.

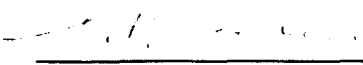
### ***Conclusion***

33. Based on the foregoing, it is my expert opinion that must carry legislation serves an important interest in furthering public television's objectives. Cable carriage is critical to public television's ability to achieve its objectives, including public service, universal access, and diversity. A public television station's loss of cable carriage deprives its viewers in cable households of access to the station's programming and services, and deprives the station of the revenues that enable it to fulfill its mission. Particularly in periods such as the current one, when federal funding is in peril, the absence of must-carry rights could leave many public television stations with significantly fewer resources, with the result that public television stations'

operations would be restricted, they would not be able to fulfill their public service mission, and the American people would be deprived of services.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 25, 1995.

  
\_\_\_\_\_  
M. Peter Downey



## **The Educational Power of Public Television At a Glance**

### **Kindergarten through 12th Grade**

- Public television is the number one resource for classroom programming in the country.
- 1.8 million teachers have access to public TV's educational programming and services.
- 29.5 million students served.
- 70,000 schools reached throughout the United States.
- 1,500 individual instructional programs, including math and science, distributed annually via satellite.
- 300 programs in reading and language arts alone.
- PTV, The Ready to Learn Service on PBS, to be launched by 11 model-site stations in July 1994, will provide a nine-hour block of children's programming, increased support services and outreach materials for children, families and caregivers.

### **Higher Education**

- PBS's Adult Learning Service (ALS) is the largest source of telecourses in the world. ALS added nine new telecourses in 1993, bringing the total to 58. Six more will be available in 1994.
- ALS has enabled more than 2.3 million adults to earn college credit since 1981.
- Over 325,000 students enrolled for college credit in 1992-1993, a 9.7% increase over 1991-1992.
- More than two-thirds of America's 3,000 colleges use ALS telecourses.
- Going the Distance -- ALS is developing this new service to offer students nationwide the opportunity to earn a two-year degree through college telecourses.

### **Distance Learning**

- More than 5,000 high school students in 28 states take advanced mathematics, science and foreign languages through Satellite Educational Resources Consortium (SERC) "distance learning" courses (live classes linking teachers and students via satellite).
- 18 SERC courses are available, including probability & statistics, discrete mathematics, honors world geography, Russian, Japanese, Latin, economics, calculus and physics.
- Telstar 401, PBS's new satellite, will aggregate public television and other services, creating the world's largest educational neighborhood in the sky.

### **Special Services**

- Mathline -- A new service, to be launched in Fall 1994, will use a variety of technologies to provide information, materials and training to help educators and parents teach math more effectively and to make math more fun and relevant for students.
- PBS ONLINE -- A growing new electronic communication service that provides a wide variety of high-quality educational and informational materials to parents, teachers and students.
- Learning Link -- The K-12 educational component of PBS ONLINE, the service is a dynamic curriculum tool and resource for teachers and students.
- Child Care -- The SESAME STREET Preschool Educational Program (PEP) and the MISTER ROGERS' NEIGHBORHOOD Child Care Partnership give child-care providers educational resources for active, creative lessons tied to these series.
- Business -- Over 500 businesses, from small to Fortune 500 companies, have used The Business Channel, video-based training programs available through PBS.
- Health Care -- More than 1,000 hospitals have used PBS's interactive videoconferences and training programs to keep professional staff up-to-date on medical information, issues and trends.
- Agriculture -- 46 land grant colleges and two agencies of the U.S. Department of Agriculture use Ag\*Sat, operated by Nebraska Educational Television, to reach thousands of agribusinessmen and women nationwide.

### **Prime Time**

- Nearly 97 million Americans are informed by public television each week.
- "More than TV" -- many PBS series provide teacher and user guides and community outreach materials.

February 1994

**Major Market Overlapped Stations**

| Station               | LUD% | Lic | Program Niche          | Overlaps            |
|-----------------------|------|-----|------------------------|---------------------|
| KBDI/Denver           | 25%  | C   | Counterculture/Ethnic  | KRMA/Denver         |
| KBTC/Tacoma           | 30%  | U   | College Credit         | KCTS/Seattle        |
| KBYU/Provo            | 50%  | U   | Children & Family      | KUED/Salt Lake      |
| KCSM/San Mateo        | 50%  | U   | College Credit         | KQED/San Francisco  |
| KLCS/Los Angeles      | 15%  | L   | K-12 Programming       | KCET/Los Angeles    |
| KMTP/San Francisco    | 5%   | C   | Ethnic Minority        | KQED/San Francisco  |
| KOCE/Huntington Beach | 40%  | U   | College Credit         | KCET/Los Angeles    |
| KTEH/San Jose         | 50%  | C   | College Credit         | KQED/San Francisco  |
| KTLC/Oklahoma City*   | 50%  | S   | Childrens & Educ       | KETA/Oklahoma City  |
| KULC/Salt Lake City*  | 15%  | U   | College Credit & Educ  | KUED/Salt Lake City |
| KWSU/Pullman          | 25%  | U   | College Credit & Educ  | KUID/Moscow         |
| WHMM/Washington       | 50%  | U   | African-American       | WETA/Washington     |
| WLAE/New Orleans      | 25%  | C   | Childrens & Educ       | WYES/New Orleans    |
| WLIW/Garden City      | 50%  | C   | Acquisitions & Ent     | WNET/New York       |
| WLRN/Miami            | 12%  | L   | K-12, Community        | WPBT/Miami          |
| WNVT/Fairfax          | 25%  | C   | Ethnic Minority/Sports | WETA/Washington     |
| WNYC/New York         | 27%  | L   | Ethnic Minority/Educ   | WNET/New York       |
| WNYE/New York         | 5%   | L   | K-12 and kids          | WNET/New York       |
| WPBA/Atlanta          | 50%  | L   | K-12, Community        | WGTV/Athens-Atlanta |
| WQEX/Pittsburgh*      | 20%  | C   | Local, how-to          | WQED/Pittsburgh     |
| WUSF/Tampa            | 30%  | U   | College Credit         | WEDU/Tampa          |
| WYBE/Philadelphia     | 3%   | C   | Counterculture/Ethnic  | WHYY/Philadelphia   |
| WYCC/Chicago          | 13%  | U   | College Credit         | WTTW/Chicago        |
| WYIN/Merrillville, In | 15%  | U   | College Credit         | WTTW/Chicago        |

LUD % = the percentage of the PBS National Program Service acquired by the station.

LIC = Licensee type; whether Community, University, State or Local authority

\* = Duopoly (i.e. licensed to the same entity as the station it overlaps.

# STATISTICS OF THE SYSTEM PUBLIC BROADCASTING SERVICE

Exhibit

## SUMMARY

April 1995

|  |                |
|--|----------------|
| NUMBER OF PBS MEMBER STATIONS              | 198            |
| NUMBER OF FCC LICENSEES                    | 175            |
| NUMBER OF CSG RECIPIENTS (PBS and non-PBS) | 202            |
| NUMBER OF PBS TRANSMITTERS                 | 345            |
| PBS VHF: 126                               | PBS UHF: 219   |
| NON-PBS VHF: 1                             | NON-PBS UHF: 4 |

## MEMBERS

### New Members in 1994

WAIQ/26, Montgomery, AL      On-air date: 12/18/62      Membership date: 7/1/94

### New Members in 1993

\*KMTP/32, San Francisco, CA      On-air date: 6/1/71      Membership date: 9/1/93

### New Members in 1992

|                            |                      |                          |
|----------------------------|----------------------|--------------------------|
| KTLC/43, Oklahoma City, OK | On-air date: 8/15/91 | Membership date: 7/1/92  |
| WEIU/51, Charleston, IL    | On-air date: 7/1/86  | Membership date: 2/21/92 |
| WPTO/14, Oxford, OH        | On-air date: 10/1/73 | Membership date: 10/9/92 |

## CSG RECIPIENTS

### CSG Recipients that are not PBS Members 5

KRSC/35, Claremore, OK  
WBCC/68, Cocoa, FL  
WIPM/3, Mayaguez, PR  
WMHQ/45, Schenectady, NY  
WNVC/56, Fairfax, VA

### PBS Members that are not CSG Recipients 1

WNYC/31, New York, NY

## LICENSEES

### FCC Licensees: 175

|            |    |
|------------|----|
| Community  | 91 |
| Local      | 9  |
| State      | 21 |
| University | 54 |

### Licensee Changes in 1993

The license for KCTF/34, Waco, Texas, originally a repeater of KNCT/Killeen, and later an independent PBS Member Station licensed to Central Texas College, has been transferred to Brazos Valley Public Broadcasting, a community licensee.

The licenses for KOPB/KEPB/KOAD/KTVR have been transferred from the State of Oregon to Oregon Public Broadcasting, Inc., a community licensee, effective July 1993.

KTPS/28, Tacoma has changed its call letters to KBTC.

Non-member CSG recipient WMHX/45, Schenectady has changed its call letters to WMHQ. WMHQ went dark in August, 1991 and resumed broadcasting, with its new call letters, in September, 1993.

\* KMTP's PBS membership originally began on 10/11/91, terminated on 12/31/92, reinstated on 9/1/93, and finally terminated on October 1, 1994.

***Licensee Changes in 1992***

The licenses for the stations of the Maine Public Broadcasting Network and the license for WCBB/10, Lewiston have been transferred to the newly formed Maine Public Broadcasting Corporation, a community licensee.

Non-member CSG recipient KXON/45, Claremore changed its call letters to KRSC in July, 1992.

**TRANSMITTERS**

*No New Transmitters in 1994*

*No New Transmitters in 1993*

*New Transmitters in 1992*

KCDT/26, Coeur d'Alene, ID

On-air date: 9/27/92

KJRE/19, Ellendale, ND

On-air date: 5/12/92

KIPT/13, Twin Falls, ID

On-air date: 1/17/92

**SERVICE TO UNSERVED AREAS**

*Non-PBS Entities providing PBS Programming under the PBS Unserved Areas Policy:*

|  |         |
|--|---------|
| PBS Member Stations Relicensing PBS Programs | 5       |
| Low-Power Television Stations                | 22      |
| Cable Systems                                | 2       |
| Total Persons Served                         | 110,991 |

\* KMTP's PBS membership originally began on 10/11/91, terminated on 12/31/92, reinstated on 9/1/93, and Finally terminated on October 1, 1994.

FELDMAN

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

|                                   |   |                            |
|-----------------------------------|---|----------------------------|
| TURNER BROADCASTING SYSTEM, INC., | ) |                            |
| <i>et al.</i> ,                   | ) |                            |
|                                   | ) |                            |
| Plaintiffs,                       | ) |                            |
| v.                                | ) | Civil Action Nos. 92-2247, |
|                                   | ) | 92-2292, 92-2492, 92-2495  |
| FEDERAL COMMUNICATIONS            | ) | and 92-02558 (SFW, TPJ,    |
| FEDERAL COMMUNICATIONS            | ) | SS)                        |
| COMMISSION, <i>et al.</i> ,       | ) |                            |
|                                   | ) |                            |
| Defendants.                       | ) |                            |
| <hr/>                             |   |                            |

DECLARATION OF RICHARD FELDMAN

Pursuant to U.S.C. § 1746, I, Richard Feldman, declare as follows:

1. I am submitting this declaration on behalf of the Association of America's Public Television Stations ("APTS") in support of the motion for summary judgment made by defendants in the above-captioned proceeding.

2. I was retained by APTS to analyze the extent to which cable television systems dropped public television stations between 1985 and 1992, when Congress enacted the must carry requirements. My analysis, which is explained further below, showed that cable systems dropped a significant number of public television stations in the relevant period, affecting over 10 million cable subscribers, and that [Redacted]

***Expert Qualifications***

3. I am Senior Vice President and General Manager of Norman Hecht Research, Inc. ("Norman Hecht"). Norman Hecht is a research, management, and marketing services firm specializing in the provision of ratings, programming, revenue and market analysis and consulting to firms in the cable and broadcast television industries.



Norman Hecht's clients have included leading television broadcast networks, network-affiliated, independent and public television stations, cable networks, cable programming services and cable operators.

4. I hold a Master of Science degree from the Massachusetts Institute of Technology ("MIT") Sloan School of Management. I have been employed in the media research business for ten years. In my current position with Norman Hecht, I have conducted or supervised hundreds of research and consulting projects for firms in the cable and broadcast television industries. I have also consulted extensively with individual public television stations to help them to analyze and improve the profitability of their operations. In the course of my work, I have become very familiar with the operations of public television stations and with the importance of cable carriage of public television programming to viewership ratings and financial contributions.

5. Prior to joining Norman Hecht in 1990, I was employed by the National Broadcasting Company ("NBC"), as Director of New Media Research. Among my responsibilities was analysis of the financial and ratings impact of cable television on NBC and all research relating to and for NBC's cable channel, CNBC. I was also responsible for research on Olympics pay-per-view, Sports Channel America, High Definition Television, DBS, and interactive television, and I was a major participant in the Committee on Nationwide Television Audience Measurement ("CONTAM") project, which evaluated Nielsen ratings methodology.

6. Prior to joining NBC, I held a research position at the MIT Research Program on Communications Policy. In that position, I was responsible for the development of Mediacalc, an interactive forecasting system for use in the communications industry.

7. I have served as a member of the Committee on National Cable Audience Measurement, the Marketing Science Institute's Advertising Effectiveness

Committee, the Federal Communications Commission Advisory Committee on Advanced Television Services Working Party on Audience Research, the Cable Television Administration and Marketing Society and the Advertising Research Foundation Video Electronic Media Council.

***Bases For Opinions***

8. The opinions expressed in this Declaration are based on knowledge and experience I have gained in connection with my employment over the past ten years, including my knowledge of the operations of public television stations. My analysis is also based in particular on (i) historical public television cable carriage data maintained by Cable Data Corporation ("CDC")<sup>1</sup>; (ii) [Redacted]

and (iii) data on the primary and secondary status of public television stations maintained by APTS. All of the CDC and APTS data upon which I have relied has been provided in electronic form to the plaintiffs in this case.

9. The CDC cable carriage figures used in my analysis were compiled by CDC from copyright filings required by law to be made by each cable system. All of the stations identified in my analysis as dropped were located within 50 miles of the cable system's headend. For the purpose of my analysis, I counted a station as dropped only if it was reported by the cable system (a) to have been carried for at least one six-month copyright reporting period, and (b) to have been dropped for at least two consecutive six-month copyright reporting periods. The fact that a station was at one time carried by a cable system indicates that the station had sufficient signal quality to be carried and, thus, to qualify for carriage under must carry rules. The criterion of two consecutive reporting

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<sup>1</sup> The CDC data is explained at length by another witness, Tom Meek. See Meek Declaration ¶¶ 24, *et al.*

periods was used to account for the possibility that a reporting period was missed through error by the cable system.

*Opinions*

10. My analysis supports the conclusion that a substantial number of public television stations which would appear to qualify for cable carriage under the 1992 must carry provisions are unlikely to be carried by cable systems unless carriage is mandated by law. I conducted a time series analysis of cable system drops of public television stations between 1985 and the first half of 1994, using CDC data reporting the number of subscribers in each six month copyright reporting period for cable systems that dropped public television stations. Because each cable system serves a certain number of households that subscribe to the cable system's service, each drop of a public television station by a cable system means that the public television station loses access to households served by the cable system.<sup>2</sup> These households are hereinafter referred to as "subscriber drops." A list of public television stations dropped by cable systems during this period and number of subscriber drops is shown in Exhibit A to this Declaration.

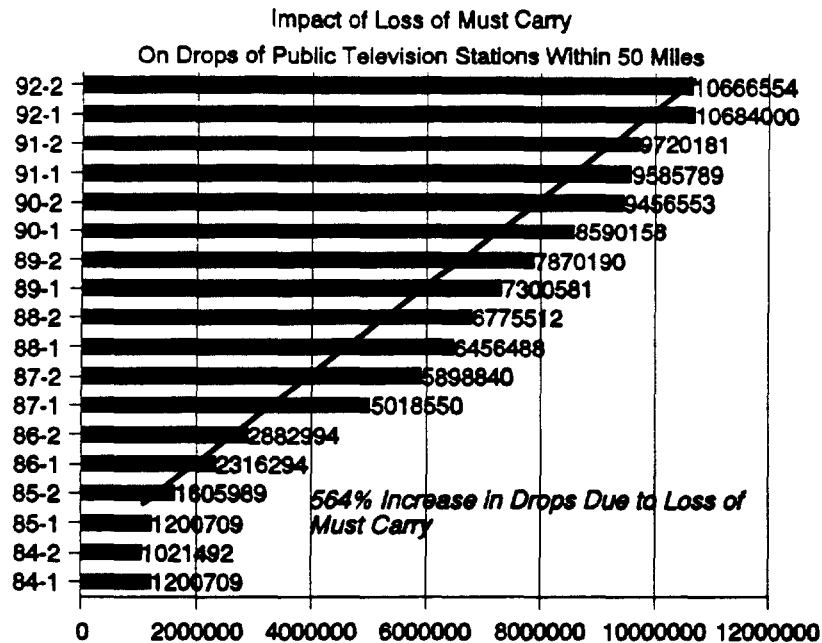
11. My analysis of the CDC drop data shows a dramatic and steadily rising increase in the number of subscriber drops following the court decision striking down the must carry regulations in 1985. The CDC data indicate that, from 1985 through the end of 1992, 314 public television stations were dropped from carriage by 1,616 cable systems.

12. The number of subscriber drops increased more than five-fold after must carry regulations were struck down in 1985, from approximately 1.6 million in 1985 to over 10.6 million in 1992.

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<sup>2</sup> I understand that other witnesses have testified that most cable television subscribers either cannot or will not switch back and forth between their cable service and over-the-air reception and that, depending on the quality of the over-the-air signal at the viewer's home, the benefit of an A/B switch may be marginal.

*Illustration 1*



13. In analyzing CDC data, I was careful to isolate those instances in which public television stations would qualify for carriage on particular cable systems pursuant to the 1992 must carry regulations. To identify local stations entitled to carriage, the data includes only stations located within 50 miles of a cable system's headend.<sup>3</sup> To identify stations that had a sufficient signal quality to be carried, I included in my analysis only stations that had been carried for at least one six-month reporting period prior to being dropped. I also analyzed the data to consider channel capacity restrictions. My analysis indicates that only 1.7 percent of the more than 10.6 million subscriber drops at the end of 1992 (or 181,889 subscriber drops) involved cable systems that were already carrying the

<sup>3</sup> This measure understates the number of local stations entitled to carriage because public television stations located further from the cable headend can also qualify as "local" if the headend is encompassed within the station's Grade B contour.

maximum number of public television stations required to be carried under the 1992 must carry rules. (See Exhibit B to this Declaration.)

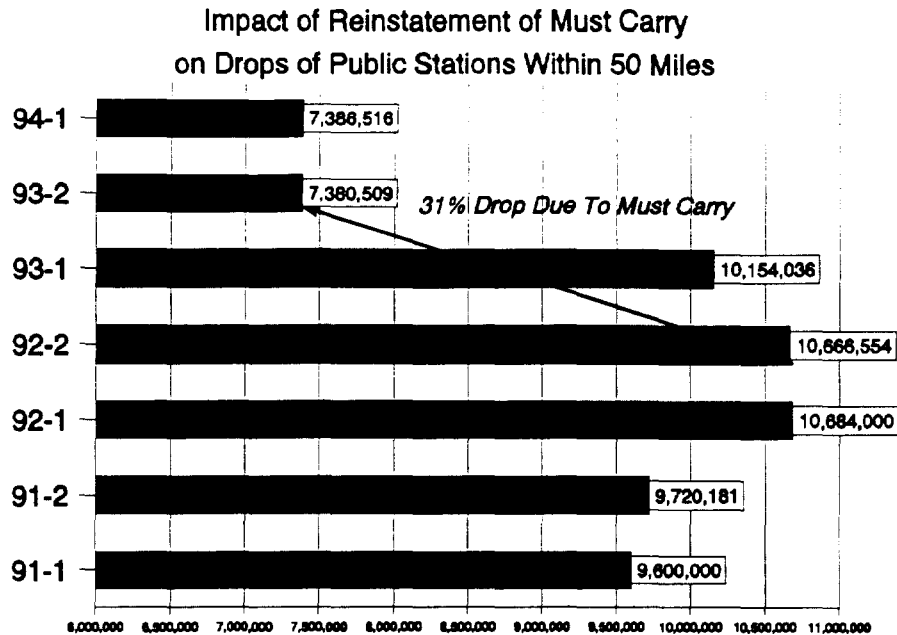
14. I understand that the CDC carriage data includes some data for private cable systems (known as SMATV's), which are not subject to must carry protection. Since SMATVs are estimated to account for 1 to 2 percent of all cable television subscribers, however, the failure to exclude all SMATV systems from the CDC data does not impact significantly on my conclusions. No effort was made to remove from the CDC data dropped public television stations that substantially duplicate the signal of another public television station carried on a particular cable system. I have reviewed the definition of substantial duplication in the applicable FCC rules that would disqualify a public television station from entitlement to carriage.<sup>4</sup> In my opinion, based on my familiarity with public television stations and television markets, very few public television stations that are local to the same cable system substantially duplicate programming, as defined by the FCC. Therefore, in my opinion, the reported subscriber drops closely reflect drops of public television stations that would qualify for carriage under the 1992 must carry rules.

15. The subscriber drop trend began to reverse itself after the reimposition of must carry obligations at the end of 1992. By one year after must carry obligations were reinstated (December 1992 for public television stations), the number of subscriber drops had decreased by about one-third. Affected public television stations gained access to an additional 3.2 million subscribers.

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<sup>4</sup> One station is deemed "to substantially duplicate" the programming of another station if it broadcasts the same programming simultaneously or non-simultaneously, for more than 50 percent of prime time and more than 50 percent outside of prime time over a three-month period. 47 C.F.R. § 76.56(a)(1).

*Illustration 2*



16. A not insignificant portion of the non-carriage that persisted after the reimposition of must carry rules is likely to be attributable to factors other than a stations failure to qualify for carriage. As I have stated above, it is my opinion that the reported subscriber drops closely reflect public television stations that would qualify for carriage on particular cable systems under the 1992 must carry rules. (See Paragraphs 13 and 14 of this Declaration.) Based on my general experience with public television stations and my review of the statements of public broadcasters submitted in this proceeding, it is my opinion that there are a number of factors other than failure to qualify for carriage that would explain persistent non-carriage, including cable system intransigence in responding to carriage requests and the inability of resource-strained public television stations to challenge even baseless denials of carriage.

17. The great majority of subscriber drops between 1985 and 1992 involved secondary stations in a given community. Secondary stations play a significant role. They tend to offer instructional or minority-interest programming and to serve

unserved and underserved segments of their communities. Where two or more public television stations are licensed in the same television market, they serve diverse community needs. In my experience, it is rare to find secondary stations offering substantially duplicate service. Because secondary public television stations serve specific community needs, each drop results in a loss of programming to cable subscribers.

18. In addition to drops of public television stations, there are many instances in which public television stations were never carried on cable systems. To be conservative, I have excluded these latter subscriber counts from my analysis, due to the possibility that some of these stations might have had insufficiently good signal quality to be carried by the relevant cable systems and therefore might not have qualified for carriage under must carry regulations. Because these stations are located within 50 miles of the system headends, however, it is likely that their signal qualities would be sufficient for purposes of the must carry regulations in most cases.

19. Based on my experience consulting with public television stations, I am aware that reduced access to cable subscribers results in reduced access to television households, which in turn results in reduced viewership. I would expect that increased carriage of public television stations as a result of must carry obligations would produce increased viewership of those stations, all other things being equal.

20. [Redacted]

[Redacted]

21. [Redacted]

I declare under penalty of perjury that the foregoing is true and correct. Sworn  
to under penalty of perjury this 24th day of May, 1995.

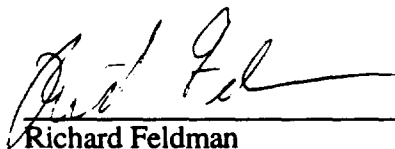
  
Richard Feldman



Exhibit A

**Drop Summary**  
**Only Those Systems Within 50 Miles Included**

| Call        | dropped841 | dropped842 | dropped851 | dropped852 | dropped861 | dropped862 | dropped871 | dropped872 |
|-------------|------------|------------|------------|------------|------------|------------|------------|------------|
| KAKM Total  | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| KAMU Total  | 560        | 1893       | 306        | 272        | 296        | 2009       | 1674       | 2204       |
| KAWE Total  | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| KBDI Total  | 218        | 14373      | 15643      | 15535      | 4466       | 4320       | 4375       | 3535       |
| KBHE Total  | 276        | 266        | 269        | 284        | 784        | 716        | 726        | 680        |
| KBIN Total  | 0          | 0          | 0          | 1267       | 1241       | 1251       | 1306       | 1347       |
| KBME Total  | 0          | 0          | 0          | 0          | 0          | 0          | 78         | 0          |
| KBTC Total  | 0          | 0          | 1476       | 1537       | 1611       | 1237       | 14305      | 15134      |
| KBYU Total  | 3377       | 2631       | 2365       | 1282       | 1247       | 1374       | 1510       | 2179       |
| KCET Total  | 0          | 0          | 2009       | 2070       | 11223      | 9982       | 0          | 0          |
| KCKA Total  | 0          | 0          | 0          | 18695      | 18989      | 19000      | 18656      | 18336      |
| KCOS Total  | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| KCPT Total  | 0          | 0          | 3267       | 3740       | 0          | 0          | 0          | 0          |
| KCSM Total  | 0          | 0          | 477        | 0          | 37929      | 38505      | 98890      | 222542     |
| KCTS Total  | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| KCWC Total  | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| KDIN Total  | 0          | 0          | 0          | 0          | 424        | 765        | 442        | 1084       |
| KDSD Total  | 0          | 352        | 351        | 411        | 386        | 373        | 89         | 468        |
| KDSE Total  | 94         | 90         | 91         | 83         | 82         | 78         | 75         | 74         |
| KDTN Total  | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| KEDT Total  | 0          | 0          | 0          | 0          | 0          | 0          | 216        | 216        |
| KEMV Total  | 315        | 224        | 223        | 1398       | 1804       | 2316       | 1598       | 2022       |
| KENW Total  | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 181        |
| KERA Total  | 0          | 0          | 0          | 0          | 1          | 1          | 0          | 376        |
| KESD Total  | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 158        |
| KETA Total  | 0          | 0          | 720        | 183        | 0          | 0          | 307        | 320        |
| KETC Total  | 0          | 0          | 0          | 0          | 226        | 224        | 250        | 232        |
| KETG Total  | 0          | 0          | 669        | 664        | 676        | 0          | 0          | 0          |
| KETH Total  | 0          | 0          | 0          | 0          | 198        | 47         | 57         | 113        |
| KETS Total  | 0          | 0          | 0          | 0          | 0          | 0          | 363        | 422        |
| KFME Total  | 0          | 0          | 0          | 0          | 0          | 0          | 147        | 148        |
| KGTF Total  | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| KHET Total  | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| KHIN Total  | 756        | 748        | 1306       | 1293       | 1295       | 1302       | 1347       | 1348       |
| KHNE Total  | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| KIDZ Total  | 1316       | 1420       | 1339       | 1344       | 1295       | 0          | 0          | 370        |
| KIIN Total  | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| KISU Total  | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| KIXE Total  | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| KLCS Total  | 9590       | 13419      | 14039      | 36775      | 32113      | 0          | 119177     | 212837     |
| KLEP Total  | 3928       | 3970       | 3991       | 4208       | 4232       | 4243       | 4256       | 4291       |
| KLNE Total  | 513        | 538        | 549        | 527        | 709        | 728        | 865        | 7475       |
| KLPB Total  | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| KLRN Total  | 0          | 7014       | 6952       | 7470       | 6909       | 7895       | 7869       | 8960       |
| KLRU Total  | 230        | 235        | 230        | 260        | 249        | 206        | 0          | 0          |
| KLTJ Total  | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| KLTM Total  | 0          | 3331       | 0          | 0          | 0          | 0          | 0          | 0          |
| KLTS Total  | 0          | 0          | 0          | 0          | 553        | 553        | 0          | 0          |
| KL VX Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| KMBH Total  | 0          | 28015      | 31030      | 33351      | 31822      | 544        | 0          | 0          |

## Exhibit A

# Drop Summary

## Only Those Systems Within 50 Miles Included

| Call       | dropped841 | dropped842 | dropped851 | dropped852 | dropped861 | dropped862 | dropped871 | dropped872 |
|------------|------------|------------|------------|------------|------------|------------|------------|------------|
| KMEB Total | 7822       | 8620       | 0          | 0          | 4238       | 10566      | 0          | 0          |
| KMNE Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| KMOS Total | 0          | 897        | 927        | 967        | 1487       | 1597       | 1756       | 633        |
| KMTP Total | 32520      | 33116      | 0          | 0          | 37929      | 64980      | 234853     | 275410     |
| KNCT Total | 141        | 147        | 348        | 532        | 499        | 493        | 7439       | 7898       |
| KNME Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| KNPB Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| KNXT Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| KOAC Total | 4188       | 5622       | 5253       | 5606       | 6847       | 11889      | 10673      | 5088       |
| KOCE Total | 228        | 316        | 311        | 2908       | 13181      | 14871      | 26932      | 39619      |
| KOED Total | 0          | 60         | 69         | 0          | 513        | 528        | 0          | 0          |
| KOET Total | 1107       | 2242       | 0          | 2694       | 2403       | 2379       | 2332       | 2810       |
| KOOD Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| KOPB Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| KOZJ Total | 4316       | 4460       | 4339       | 4471       | 4424       | 4651       | 4661       | 4875       |
| KOZK Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| KPBS Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| KPNE Total | 0          | 0          | 0          | 0          | 125        | 125        | 0          | 135        |
| KPTS Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 62         |
| KQED Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 341        |
| KRCB Total | 16980      | 14046      | 17668      | 18041      | 15012      | 16099      | 16413      | 18337      |
| KRIN Total | 1313       | 1399       | 2126       | 1939       | 1955       | 647        | 934        | 2106       |
| KRMA Total | 218        | 0          | 0          | 253        | 253        | 252        | 252        | 252        |
| KRNE Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| KRWG Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| KSIN Total | 0          | 0          | 175        | 0          | 212        | 301        | 0          | 291        |
| KSMQ Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 351        |
| KSPS Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| KSRE Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| KSWK Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| KSYS Total | 0          | 0          | 0          | 0          | 306        | 0          | 319        | 311        |
| KTCA Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| KTCI Total | 0          | 0          | 0          | 0          | 0          | 1883       | 1594       | 4745       |
| KTEH Total | 0          | 0          | 0          | 0          | 0          | 20115      | 86968      | 93768      |
| KTEJ Total | 0          | 739        | 760        | 756        | 766        | 759        | 385        | 5525       |
| KTIN Total | 3919       | 1967       | 1981       | 1959       | 3987       | 4166       | 2199       | 122        |
| KTLC Total | 959        | 764        | 429        | 237        | 0          | 241        | 402        | 425        |
| KTNE Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| KTOO Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| KTSC Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| KTSD Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| KTVR Total | 576        | 576        | 589        | 584        | 577        | 606        | 588        | 597        |
| KTWU Total | 0          | 0          | 0          | 6358       | 330        | 301        | 0          | 0          |
| KTXT Total | 0          | 0          | 0          | 0          | 0          | 161        | 0          | 0          |
| KUAC Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| KUCU Total | 0          | 0          | 0          | 0          | 0          | 1063       | 1043       | 1018       |
| KUED Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| KUHT Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| KUID Total | 0          | 0          | 0          | 196        | 206        | 192        | 193        | 193        |
| KULC Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |

Exhibit A

**Drop Summary**  
**Only Those Systems Within 50 Miles Included**

| Call       | dropped841 | dropped842 | dropped851 | dropped852 | dropped861 | dropped862 | dropped871 | dropped872 |
|------------|------------|------------|------------|------------|------------|------------|------------|------------|
| KUON Total | 0          | 0          | 1844       | 1841       | 11682      | 36742      | 37208      | 40644      |
| KUSD Total | 0          | 0          | 507        | 490        | 506        | 532        | 209        | 559        |
| KVCR Total | 61760      | 11086      | 6704       | 7545       | 6033       | 8593       | 17347      | 47806      |
| KVDO Total | 0          | 4304       | 4094       | 4260       | 4319       | 4427       | 4526       | 4754       |
| KVIE Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| KVPT Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| KWCM Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| KWET Total | 3706       | 3912       | 5079       | 4898       | 4772       | 5173       | 1826       | 5243       |
| KWSE Total | 502        | 0          | 279        | 274        | 0          | 0          | 0          | 0          |
| KWSU Total | 0          | 132        | 120        | 729        | 704        | 0          | 1289       | 1248       |
| KXNE Total | 0          | 0          | 0          | 0          | 0          | 0          | 208        | 226        |
| KXON Total | 0          | 0          | 0          | 0          | 0          | 313        | 309        | 301        |
| KYIN Total | 0          | 3333       | 5218       | 5332       | 2797       | 2912       | 1251       | 1318       |
| KYNE Total | 0          | 0          | 0          | 1267       | 1241       | 1412       | 1481       | 1629       |
| KYUK Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| KYVE Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| KZSD Total | 0          | 0          | 0          | 0          | 1220       | 1220       | 0          | 0          |
| WABW Total | 0          | 567        | 594        | 560        | 535        | 493        | 494        | 513        |
| WBGU Total | 0          | 0          | 6610       | 6003       | 5858       | 6045       | 5918       | 4552       |
| WBIQ Total | 0          | 3711       | 3578       | 4978       | 4983       | 5195       | 112        | 143        |
| WBRA Total | 0          | 0          | 0          | 0          | 0          | 516        | 2878       | 3318       |
| WCAE Total | 0          | 43152      | 63570      | 67815      | 83231      | 81296      | 82841      | 85221      |
| WCBF Total | 0          | 0          | 0          | 166        | 0          | 0          | 170        | 200        |
| WCES Total | 0          | 0          | 220        | 225        | 1649       | 1652       | 1604       | 1574       |
| WCET Total | 0          | 0          | 0          | 0          | 4947       | 0          | 21921      | 16847      |
| WCFE Total | 0          | 0          | 968        | 1012       | 994        | 1035       | 966        | 546        |
| WCIQ Total | 9892       | 4268       | 3057       | 2070       | 2255       | 2240       | 8644       | 9102       |
| WCLP Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| WCML Total | 0          | 0          | 0          | 0          | 400        | 400        | 0          | 0          |
| WCMU Total | 0          | 0          | 0          | 1281       | 1268       | 1301       | 3567       | 3674       |
| WCMV Total | 1204       | 1238       | 1551       | 0          | 1268       | 0          | 1291       | 1260       |
| WCNY Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| WCPB Total | 3171       | 0          | 0          | 0          | 0          | 4058       | 4084       | 4221       |
| WCTE Total | 935        | 0          | 944        | 950        | 988        | 979        | 1005       | 1009       |
| WCVE Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| WCVN Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 918        |
| WCVW Total | 879        | 927        | 997        | 1017       | 14533      | 15588      | 16092      | 18046      |
| WDCN Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| WDIQ Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| WDPB Total | 14492      | 42408      | 919        | 975        | 23077      | 22672      | 40493      | 40044      |
| WDSE Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| WEAO Total | 16711      | 3379       | 63374      | 65055      | 3634       | 4064       | 12108      | 37478      |
| WEDH Total | 9284       | 9391       | 237        | 325        | 270        | 225        | 28179      | 33623      |
| WEDN Total | 89606      | 80264      | 55320      | 49725      | 52803      | 6540       | 104969     | 112405     |
| WEDU Total | 0          | 0          | 0          | 0          | 0          | 895        | 895        | 0          |
| WEDW Total | 93858      | 95997      | 99248      | 325        | 107430     | 161176     | 240393     | 286220     |
| WEDY Total | 0          | 11522      | 20863      | 0          | 0          | 0          | 0          | 0          |
| WEIQ Total | 0          | 0          | 0          | 0          | 0          | 20087      | 20048      | 20101      |
| WEKW Total | 0          | 0          | 0          | 38         | 9408       | 7654       | 9802       | 0          |
| WENH Total | 0          | 0          | 0          | 0          | 0          | 0          | 26670      | 27559      |

# Exhibit A

## Drop Summary Only Those Systems Within 50 Miles Included

| Call       | dropped841 | dropped842 | dropped851 | dropped852 | dropped861 | dropped862 | dropped871 | dropped872 |
|------------|------------|------------|------------|------------|------------|------------|------------|------------|
| WETA Total | 229        | 364        | 0          | 316        | 330        | 0          | 529        | 529        |
| WETK Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| WFIQ Total | 0          | 0          | 0          | 1631       | 1535       | 0          | 753        | 317        |
| WFPT Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| WFSG Total | 3979       | 7150       | 7821       | 4504       | 4936       | 4919       | 5495       | 5391       |
| WFSU Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| WFUM Total | 0          | 0          | 457        | 2414       | 2166       | 727        | 5630       | 5505       |
| WFWA Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| WFYI Total | 621        | 635        | 680        | 693        | 715        | 718        | 1483       | 660        |
| WGBH Total | 0          | 0          | 0          | 0          | 0          | 39849      | 41643      | 0          |
| WGBX Total | 0          | 0          | 10569      | 10685      | 11270      | 11560      | 11896      | 50526      |
| WGBY Total | 0          | 0          | 6581       | 0          | 0          | 0          | 0          | 0          |
| WGIQ Total | 0          | 706        | 0          | 0          | 0          | 0          | 0          | 0          |
| WGPT Total | 2940       | 3171       | 3153       | 2998       | 2831       | 2655       | 2711       | 0          |
| WGTE Total | 16350      | 16554      | 17158      | 326        | 18773      | 18929      | 346        | 369        |
| WGTV Total | 0          | 0          | 0          | 0          | 4857       | 5030       | 5032       | 5327       |
| WGVK Total | 1992       | 2000       | 2051       | 2046       | 2046       | 2111       | 2152       | 2227       |
| WGVU Total | 405        | 0          | 0          | 0          | 0          | 0          | 0          | 292        |
| WHA Total  | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| WHED Total | 0          | 0          | 315        | 347        | 325        | 346        | 326        | 369        |
| WHIQ Total | 5239       | 5351       | 0          | 0          | 75         | 5758       | 12281      | 12376      |
| WHLA Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| WHMM Total | 0          | 0          | 0          | 138        | 0          | 108        | 645        | 659        |
| WHRM Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| WHRO Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| WHWC Total | 0          | 0          | 0          | 0          | 0          | 83         | 83         | 83         |
| WHYY Total | 0          | 0          | 0          | 17017      | 16650      | 17233      | 668        | 704        |
| WIIQ Total | 0          | 0          | 0          | 0          | 0          | 1410       | 1435       | 1467       |
| WILL Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| WIPB Total | 0          | 1034       | 4281       | 4405       | 4575       | 4642       | 4606       | 4700       |
| WIPR Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 935        |
| WITF Total | 0          | 5713       | 6230       | 6647       | 7123       | 7615       | 8130       | 8714       |
| WITV Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| WJCT Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| WJPM Total | 18745      | 17418      | 17966      | 24622      | 18724      | 18731      | 19578      | 20158      |
| WJPT Total | 40546      | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| WJSP Total | 0          | 0          | 8141       | 8233       | 8458       | 8971       | 9039       | 9645       |
| WJWJ Total | 536        | 583        | 0          | 0          | 0          | 1006       | 1009       | 1002       |
| WKAR Total | 0          | 0          | 0          | 0          | 16610      | 18026      | 18465      | 20777      |
| WKAS Total | 2452       | 2475       | 2854       | 0          | 200        | 420        | 203        | 0          |
| WKGB Total | 0          | 1082       | 5817       | 5889       | 7046       | 6006       | 6047       | 7111       |
| WKHA Total | 0          | 0          | 628        | 0          | 0          | 0          | 0          | 129        |
| WKLE Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| WKMA Total | 0          | 0          | 0          | 0          | 17857      | 17734      | 17845      | 18336      |
| WKMJ Total | 0          | 0          | 0          | 0          | 0          | 1827       | 1865       | 2036       |
| WKMR Total | 668        | 668        | 877        | 867        | 887        | 894        | 894        | 952        |
| WKMU Total | 2731       | 2949       | 2784       | 2890       | 2768       | 23824      | 27072      | 28122      |
| WKNO Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 143        |
| WKOH Total | 17702      | 17799      | 17807      | 17601      | 0          | 0          | 0          | 18336      |
| WKON Total | 0          | 456        | 444        | 463        | 464        | 1225       | 1402       | 500        |

Exhibit A

**Drop Summary**  
**Only Those Systems Within 50 Miles Included**

| Call       | dropped841 | dropped842 | dropped851 | dropped852 | dropped861 | dropped862 | dropped871 | dropped872 |
|------------|------------|------------|------------|------------|------------|------------|------------|------------|
| WKPC Total | 0          | 0          | 1210       | 1297       | 1292       | 1376       | 0          | 0          |
| WKPD Total | 822        | 341        | 826        | 832        | 790        | 799        | 461        | 800        |
| WKPI Total | 0          | 0          | 205        | 205        | 597        | 919        | 2159       | 1730       |
| WKSO Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| WKZT Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| WLAE Total | 27227      | 22364      | 22667      | 17910      | 23968      | 3442       | 8942       | 11211      |
| WLED Total | 0          | 0          | 4257       | 4133       | 4118       | 4103       | 4184       | 4222       |
| WLEF Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| WLIW Total | 0          | 0          | 0          | 59109      | 61460      | 68907      | 105781     | 99767      |
| WLJT Total | 0          | 0          | 0          | 0          | 74         | 0          | 0          | 74         |
| WLPB Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 542        |
| WLRN Total | 1125       | 1218       | 93         | 1088       | 1131       | 0          | 51990      | 59431      |
| WLVN Total | 1791       | 2197       | 1912       | 6208       | 29862      | 56022      | 55141      | 76387      |
| WMAB Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| WMAE Total | 0          | 0          | 0          | 0          | 0          | 1771       | 1741       | 11812      |
| WMAH Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 385        |
| WMAO Total | 0          | 0          | 0          | 0          | 0          | 112        | 143        | 137        |
| WMAV Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| WMAW Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 125        |
| WMEA Total | 6284       | 6041       | 6458       | 6428       | 6856       | 6798       | 7187       | 7213       |
| WMEB Total | 0          | 0          | 0          | 0          | 0          | 240        | 251        | 0          |
| WMEC Total | 974        | 982        | 0          | 0          | 0          | 0          | 0          | 0          |
| WMEG Total | 0          | 0          | 8768       | 9126       | 9458       | 9678       | 54019      | 56352      |
| WMEM Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| WMFE Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| WMHT Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| WMPB Total | 0          | 0          | 511        | 0          | 190        | 177        | 28027      | 29855      |
| WMPN Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 496        |
| WMPT Total | 18658      | 20237      | 21460      | 21528      | 22031      | 22927      | 23921      | 24117      |
| WMTJ Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| WMVS Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| WMVT Total | 0          | 0          | 0          | 3209       | 3303       | 0          | 0          | 0          |
| WNED Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| WNEO Total | 8594       | 0          | 9345       | 5830       | 73668      | 77901      | 68727      | 89150      |
| WNET Total | 0          | 0          | 0          | 0          | 0          | 0          | 4675       | 5448       |
| WNIN Total | 0          | 145        | 781        | 803        | 741        | 235        | 161        | 163        |
| WNIT Total | 0          | 1334       | 5231       | 429        | 445        | 3461       | 15056      | 15660      |
| WNJB Total | 33786      | 30673      | 19327      | 20479      | 0          | 26027      | 24638      | 55692      |
| WNJM Total | 321268     | 106788     | 4514       | 229333     | 259888     | 274649     | 556586     | 742528     |
| WNJS Total | 10970      | 11797      | 1912       | 32835      | 64217      | 87465      | 183842     | 192494     |
| WNJT Total | 21225      | 32258      | 32986      | 47692      | 70999      | 74706      | 71945      | 89875      |
| WNMU Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| WNPB Total | 0          | 3970       | 15748      | 15834      | 16103      | 20162      | 19267      | 21889      |
| WNPE Total | 0          | 0          | 0          | 0          | 0          | 0          | 1697       | 1721       |
| WNTV Total | 4587       | 4539       | 4595       | 4596       | 4896       | 8363       | 6873       | 5311       |
| WNVC Total | 0          | 0          | 679        | 0          | 2820       | 46301      | 75398      | 92788      |
| WNVN Total | 0          | 0          | 0          | 138        | 0          | 108        | 645        | 659        |
| WNYC Total | 10098      | 0          | 184121     | 8535       | 44234      | 124186     | 178804     | 173821     |
| WNYE Total | 0          | 6000       | 6566       | 194883     | 354095     | 599515     | 1135677    | 1235594    |
| WOSU Total | 0          | 0          | 0          | 277        | 270        | 55         | 491        | 912        |

Exhibit A

**Drop Summary**  
**Only Those Systems Within 50 Miles Included**

| Call       | dropped841 | dropped842 | dropped851 | dropped852 | dropped861 | dropped862 | dropped871 | dropped872 |
|------------|------------|------------|------------|------------|------------|------------|------------|------------|
| WOUB Total | 0          | 0          | 374        | 429        | 622        | 745        | 937        | 1427       |
| WOUC Total | 0          | 0          | 0          | 0          | 0          | 0          | 5681       | 5709       |
| WPBA Total | 0          | 0          | 944        | 1019       | 1127       | 1109       | 235        | 586        |
| WPBO Total | 209        | 207        | 217        | 0          | 0          | 312        | 0          | 0          |
| WPBT Total | 0          | 0          | 0          | 250        | 581        | 0          | 0          | 0          |
| WPBY Total | 0          | 0          | 0          | 83         | 83         | 375        | 624        | 263        |
| WPNE Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| WPSX Total | 0          | 0          | 0          | 0          | 0          | 0          | 2028       | 44818      |
| WPTD Total | 2872       | 0          | 1955       | 4650       | 5507       | 5981       | 6200       | 6875       |
| WPTO Total | 0          | 0          | 47677      | 50517      | 51645      | 61516      | 62782      | 66264      |
| WQEC Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 255        |
| WQED Total | 0          | 0          | 0          | 0          | 0          | 105        | 7689       | 14416      |
| WQEX Total | 0          | 13897      | 20134      | 107533     | 151608     | 158094     | 131958     | 65665      |
| WQLN Total | 0          | 0          | 1164       | 1292       | 1277       | 1292       | 1385       | 1390       |
| WQPT Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| WRES Total | 46583      | 50191      | 69059      | 72752      | 72829      | 78544      | 79974      | 84804      |
| WRET Total | 0          | 0          | 0          | 0          | 303        | 265        | 0          | 319        |
| WRJA Total | 40716      | 41638      | 42454      | 43645      | 47321      | 46924      | 48670      | 51089      |
| WRLK Total | 0          | 0          | 4205       | 4653       | 4699       | 4804       | 4331       | 4431       |
| WSBE Total | 0          | 10814      | 11081      | 0          | 8674       | 14761      | 68230      | 64527      |
| WSBN Total | 4665       | 5571       | 5271       | 5337       | 5356       | 5478       | 5497       | 3403       |
| WSFP Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 1069       |
| WSIU Total | 0          | 0          | 477        | 487        | 0          | 457        | 1181       | 1207       |
| WSJK Total | 3237       | 0          | 0          | 0          | 0          | 0          | 1049       | 2297       |
| WSKG Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| WSRE Total | 100        | 100        | 0          | 130        | 546        | 0          | 349        | 690        |
| WSWP Total | 0          | 0          | 0          | 135        | 135        | 139        | 139        | 44         |
| WTCI Total | 0          | 0          | 0          | 0          | 0          | 0          | 10416      | 11122      |
| WTIU Total | 0          | 0          | 0          | 0          | 0          | 0          | 1770       | 1880       |
| WTJX Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 935        |
| WTTW Total | 0          | 0          | 285        | 0          | 0          | 73         | 340        | 531        |
| WTVI Total | 547        | 678        | 676        | 706        | 779        | 885        | 0          | 0          |
| WTVP Total | 238        | 866        | 654        | 249        | 670        | 1041       | 942        | 371        |
| WTVS Total | 0          | 0          | 384        | 303        | 1591       | 212        | 201        | 0          |
| WUCM Total | 549        | 560        | 592        | 0          | 577        | 0          | 5779       | 5948       |
| WUFT Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| WUNC Total | 0          | 36083      | 36342      | 37811      | 38158      | 38115      | 44176      | 45412      |
| WUND Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| WUNE Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| WUNF Total | 0          | 0          | 0          | 0          | 0          | 378        | 335        | 370        |
| WUNG Total | 3373       | 3908       | 1706       | 1877       | 1821       | 1653       | 0          | 0          |
| WUNJ Total | 0          | 0          | 887        | 836        | 1112       | 1008       | 1238       | 1166       |
| WUNK Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| WUNL Total | 0          | 293        | 293        | 293        | 300        | 300        | 709        | 0          |
| WUNM Total | 125        | 125        | 125        | 125        | 125        | 125        | 125        | 125        |
| WUNP Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| WUSF Total | 0          | 0          | 0          | 334        | 334        | 334        | 0          | 0          |
| WUSI Total | 5344       | 7807       | 7285       | 5887       | 5891       | 3473       | 1110       | 3968       |
| WVAN Total | 0          | 581        | 826        | 868        | 1649       | 2614       | 1706       | 1842       |
| WVER Total | 1690       | 0          | 0          | 0          | 0          | 0          | 1317       | 414        |

Exhibit A

**Drop Summary**  
**Only Those Systems Within 50 Miles Included**

| Call               | dropped841     | dropped842     | dropped851     | dropped852     | dropped861     | dropped862     | dropped871     | dropped872     |
|--------------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|
| <b>WVIA Total</b>  | 0              | 0              | 1205           | 1250           | 1322           | 1283           | 59026          | 58616          |
| <b>WVIZ Total</b>  | 0              | 0              | 0              | 0              | 188            | 34886          | 37219          | 46359          |
| <b>WVPT Total</b>  | 0              | 0              | 0              | 0              | 0              | 0              | 0              | 0              |
| <b>WVTA Total</b>  | 0              | 0              | 0              | 721            | 0              | 1383           | 1571           | 1743           |
| <b>WVUT Total</b>  | 0              | 2593           | 2530           | 2560           | 2547           | 6075           | 5999           | 7507           |
| <b>WWPB Total</b>  | 2182           | 2162           | 0              | 3761           | 2461           | 0              | 0              | 0              |
| <b>WXEL Total</b>  | 0              | 0              | 0              | 0              | 0              | 987            | 43481          | 69960          |
| <b>WXGA Total</b>  | 2800           | 3000           | 0              | 3000           | 4000           | 0              | 4000           | 4300           |
| <b>WYCC Total</b>  | 62820          | 25181          | 0              | 32608          | 79489          | 99333          | 85974          | 88355          |
| <b>WYES Total</b>  | 0              | 0              | 0              | 0              | 0              | 0              | 0              | 0              |
| <b>Grand Total</b> | <b>1164962</b> | <b>1021492</b> | <b>1200709</b> | <b>1605989</b> | <b>2316294</b> | <b>2982994</b> | <b>5018550</b> | <b>5898840</b> |

Exhibit A

**Drop Summary**  
**Only Those Systems Within 50 Miles Included**

| Call       | dropped881 | dropped882 | dropped891 | dropped892 | dropped901 | dropped902 | dropped911 | dropped912 |
|------------|------------|------------|------------|------------|------------|------------|------------|------------|
| KAKM Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| KAMU Total | 572        | 584        | 574        | 588        | 633        | 618        | 591        | 639        |
| Kawe Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| KBDI Total | 4406       | 2297       | 5039       | 5697       | 6648       | 6395       | 5393       | 5700       |
| KBHE Total | 905        | 2618       | 2550       | 3026       | 2880       | 2864       | 3238       | 2923       |
| KBIN Total | 1419       | 1501       | 1544       | 153949     | 78537      | 82100      | 81471      | 84104      |
| KBME Total | 433        | 441        | 289        | 284        | 212        | 221        | 296        | 225        |
| KBTC Total | 15182      | 17058      | 15627      | 16225      | 18834      | 19701      | 20556      | 21271      |
| KBYU Total | 1979       | 173        | 2618       | 2149       | 2216       | 2407       | 4876       | 5269       |
| KCET Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| KCKA Total | 18773      | 18840      | 18941      | 20052      | 19234      | 19728      | 19577      | 19521      |
| KCOS Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| KCPT Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 199        |
| KCSM Total | 253512     | 272547     | 279124     | 288139     | 363127     | 390627     | 413580     | 415788     |
| KCTS Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| KCWC Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| KDIN Total | 594        | 0          | 654        | 700        | 0          | 777        | 783        | 0          |
| KDSD Total | 482        | 92         | 666        | 670        | 736        | 730        | 727        | 736        |
| KDSE Total | 82         | 0          | 91         | 91         | 120        | 119        | 120        | 93         |
| KDTN Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| KEDT Total | 216        | 216        | 216        | 892        | 867        | 838        | 0          | 0          |
| KEMV Total | 1581       | 1719       | 2904       | 2637       | 2950       | 4762       | 2278       | 2318       |
| KENW Total | 198        | 1353       | 1380       | 1796       | 1489       | 1581       | 1603       | 1619       |
| KERA Total | 376        | 376        | 376        | 376        | 3506       | 3777       | 1533       | 1514       |
| KESD Total | 615        | 608        | 630        | 648        | 691        | 698        | 841        | 524        |
| KETA Total | 556        | 243        | 642        | 248        | 0          | 0          | 438        | 1581       |
| KETC Total | 239        | 228        | 235        | 266        | 286        | 307        | 270        | 307        |
| KETG Total | 539        | 545        | 0          | 0          | 0          | 0          | 0          | 555        |
| KETH Total | 704        | 976        | 1174       | 388        | 421        | 162        | 99         | 513        |
| KETS Total | 0          | 0          | 48         | 58         | 0          | 478        | 455        | 462        |
| KFME Total | 26         | 27         | 25         | 30         | 35         | 28         | 31         | 32         |
| KGTF Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| KHET Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| KHIN Total | 1016       | 825        | 1439       | 1463       | 675        | 1582       | 2307       | 2282       |
| KHNE Total | 0          | 0          | 0          | 902        | 839        | 853        | 858        | 938        |
| KIDZ Total | 0          | 0          | 6334       | 6792       | 6920       | 6775       | 6849       | 6835       |
| KIIN Total | 202        | 221        | 228        | 353        | 432        | 0          | 440        | 313        |
| KISU Total | 0          | 0          | 0          | 0          | 0          | 0          | 113        | 117        |
| KIXE Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| KLCS Total | 228361     | 178557     | 237712     | 263537     | 277586     | 302950     | 324790     | 324485     |
| KLEP Total | 4449       | 4502       | 4548       | 4568       | 0          | 0          | 0          | 4639       |
| KLNE Total | 7624       | 9290       | 8129       | 8503       | 8683       | 7700       | 8291       | 8567       |
| KLPB Total | 0          | 0          | 0          | 0          | 0          | 0          | 300        | 280        |
| KLRN Total | 8357       | 9376       | 8908       | 9759       | 9659       | 9888       | 10025      | 10028      |
| KLRU Total | 747        | 751        | 0          | 0          | 0          | 0          | 0          | 83         |
| KLTJ Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| KLTM Total | 0          | 0          | 0          | 0          | 0          | 0          | 3234       | 3307       |
| KLTS Total | 576        | 542        | 515        | 608        | 1011       | 59060      | 59590      | 793        |
| KLVB Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| KMBH Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |



Exhibit A

**Drop Summary**  
**Only Those Systems Within 50 Miles Included**

| Call       | dropped881 | dropped882 | dropped891 | dropped892 | dropped901 | dropped902 | dropped911 | dropped912 |
|------------|------------|------------|------------|------------|------------|------------|------------|------------|
| KMEB Total | 0          | 13321      | 13588      | 14331      | 14643      | 15069      | 15503      | 16172      |
| KMNE Total | 471        | 483        | 0          | 0          | 0          | 0          | 0          | 0          |
| KMOS Total | 2246       | 2292       | 2620       | 2121       | 3386       | 3695       | 2221       | 2275       |
| KMTP Total | 275228     | 365105     | 414668     | 420957     | 445679     | 445658     | 461161     | 563877     |
| KNCT Total | 8061       | 8202       | 9619       | 10041      | 50916      | 50125      | 49164      | 49211      |
| KNME Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| KNPB Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 107        |
| KNXT Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 221        |
| KOAC Total | 4729       | 4754       | 6126       | 7630       | 7781       | 7515       | 7641       | 7747       |
| KOCE Total | 45674      | 64697      | 69913      | 72545      | 121314     | 125577     | 128711     | 142357     |
| KOED Total | 0          | 0          | 0          | 0          | 43         | 45         | 0          | 95         |
| KOET Total | 1944       | 2374       | 1598       | 956        | 2415       | 2769       | 1828       | 909        |
| KOOD Total | 0          | 0          | 0          | 83         | 81         | 0          | 0          | 0          |
| KOPB Total | 1303       | 4595       | 3345       | 3356       | 0          | 0          | 0          | 0          |
| KOZJ Total | 0          | 0          | 5153       | 5502       | 0          | 0          | 0          | 0          |
| KOZK Total | 1896       | 1919       | 1999       | 0          | 0          | 0          | 0          | 0          |
| KPBS Total | 0          | 0          | 161        | 175        | 354        | 371        | 354        | 365        |
| KPNE Total | 143        | 197        | 349        | 140        | 162        | 315        | 477        | 539        |
| KPTS Total | 56         | 0          | 57         | 62         | 76         | 69         | 0          | 0          |
| KQED Total | 341        | 2492       | 2777       | 2726       | 2562       | 2524       | 2475       | 0          |
| KRCB Total | 19281      | 20577      | 20289      | 22305      | 23030      | 0          | 0          | 1727       |
| KRIN Total | 2340       | 2544       | 3974       | 3055       | 2839       | 2413       | 2753       | 2874       |
| KRMA Total | 252        | 252        | 256        | 256        | 474        | 474        | 474        | 474        |
| KRNE Total | 0          | 0          | 0          | 409        | 396        | 395        | 390        | 401        |
| KRWG Total | 0          | 112        | 0          | 0          | 0          | 0          | 496        | 545        |
| KSIN Total | 296        | 322        | 156        | 509        | 496        | 136        | 522        | 532        |
| KSMQ Total | 637        | 0          | 0          | 0          | 0          | 0          | 704        | 0          |
| KSPS Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| KSRE Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| KSWK Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| KSYS Total | 333        | 0          | 333        | 339        | 0          | 0          | 0          | 0          |
| KTCA Total | 0          | 0          | 0          | 0          | 0          | 342        | 306        | 192        |
| KTCI Total | 5207       | 5083       | 17800      | 18703      | 1588       | 1738       | 1725       | 1700       |
| KTEH Total | 93321      | 99151      | 75170      | 47372      | 50183      | 50040      | 51908      | 53999      |
| KTEJ Total | 0          | 1583       | 1102       | 2528       | 1883       | 3344       | 3005       | 1458       |
| KTIN Total | 691        | 5147       | 4659       | 4655       | 2912       | 3130       | 3141       | 2567       |
| KTLC Total | 417        | 426        | 777        | 238        | 238        | 286        | 0          | 1228       |
| KTNE Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| KTOO Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| KTSC Total | 0          | 208        | 473        | 0          | 0          | 160        | 373        | 423        |
| KTSD Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| KTVR Total | 739        | 140        | 635        | 633        | 170        | 6917       | 6789       | 466        |
| KTWU Total | 0          | 517        | 511        | 536        | 10434      | 11737      | 10786      | 12424      |
| KTXT Total | 0          | 0          | 0          | 0          | 0          | 186        | 187        | 0          |
| KUAC Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| KUCU Total | 1121       | 1197       | 1203       | 962        | 1498       | 1548       | 1496       | 1586       |
| KUED Total | 0          | 0          | 0          | 0          | 0          | 56         | 56         | 56         |
| KUHT Total | 243        | 243        | 314        | 0          | 243        | 243        | 243        | 243        |
| KUID Total | 186        | 0          | 0          | 229        | 216        | 217        | 0          | 248        |
| KULC Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 74         |

Exhibit A

**Drop Summary**  
**Only Those Systems Within 50 Miles Included**

| Call       | dropped881 | dropped882 | dropped891 | dropped892 | dropped901 | dropped902 | dropped911 | dropped912 |
|------------|------------|------------|------------|------------|------------|------------|------------|------------|
| KUON Total | 41444      | 44121      | 44124      | 45614      | 33210      | 47886      | 48879      | 50959      |
| KUSD Total | 0          | 602        | 601        | 0          | 623        | 645        | 0          | 837        |
| KVCR Total | 69473      | 111316     | 126047     | 145688     | 267160     | 282062     | 295359     | 290720     |
| KVDO Total | 4796       | 4923       | 4758       | 5022       | 4942       | 5053       | 4773       | 5114       |
| KVIE Total | 0          | 20537      | 21110      | 22143      | 22880      | 23339      | 23923      | 24349      |
| KVPT Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| KWCM Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| KWET Total | 5225       | 4703       | 5366       | 5182       | 1758       | 1681       | 1461       | 1426       |
| KWSE Total | 188        | 0          | 208        | 205        | 198        | 201        | 0          | 0          |
| KWSU Total | 1290       | 1290       | 968        | 1188       | 1215       | 1186       | 1219       | 1005       |
| KXNE Total | 223        | 1421       | 1444       | 1492       | 1440       | 1477       | 1477       | 1482       |
| KXON Total | 292        | 294        | 300        | 321        | 321        | 0          | 0          | 368        |
| KYIN Total | 1431       | 0          | 822        | 831        | 812        | 818        | 810        | 803        |
| KYNE Total | 1535       | 1607       | 1687       | 1705       | 1698       | 212        | 212        | 209        |
| KYUK Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 52         |
| KYVE Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| KZSD Total | 792        | 792        | 774        | 757        | 759        | 753        | 1745       | 745        |
| WABW Total | 512        | 516        | 534        | 516        | 564        | 552        | 594        | 585        |
| WBGU Total | 6574       | 7067       | 6992       | 7362       | 7552       | 7998       | 8050       | 8219       |
| WBIQ Total | 166        | 174        | 0          | 0          | 0          | 4787       | 5959       | 5974       |
| WBRA Total | 988        | 1186       | 991        | 5000       | 2258       | 2367       | 5157       | 5161       |
| WCAE Total | 89376      | 90027      | 97644      | 94547      | 97384      | 101101     | 102865     | 106951     |
| WCBB Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| WCES Total | 1461       | 1320       | 1697       | 1629       | 1589       | 1631       | 2164       | 2752       |
| WCET Total | 18215      | 18711      | 130999     | 131838     | 133944     | 134504     | 117715     | 118578     |
| WCFE Total | 1062       | 1056       | 1092       | 1070       | 1084       | 1086       | 1127       | 1253       |
| WCIQ Total | 10263      | 10606      | 11875      | 12387      | 13134      | 8504       | 8702       | 9096       |
| WCLP Total | 5598       | 5943       | 5983       | 6020       | 6314       | 6226       | 6492       | 6545       |
| WCML Total | 383        | 465        | 0          | 0          | 0          | 0          | 0          | 0          |
| WCMU Total | 3526       | 3527       | 0          | 313        | 299        | 288        | 293        | 311        |
| WCMV Total | 1260       | 1470       | 1687       | 1700       | 2171       | 1884       | 1853       | 1910       |
| WCNY Total | 0          | 0          | 114        | 309        | 205        | 296        | 298        | 290        |
| WCPB Total | 21162      | 22465      | 21816      | 3034       | 3168       | 3400       | 3498       | 3552       |
| WCTE Total | 1044       | 994        | 1010       | 1334       | 1323       | 1318       | 1431       | 1542       |
| WCVE Total | 0          | 0          | 0          | 0          | 0          | 930        | 1215       | 1215       |
| WCVN Total | 0          | 1437       | 2253       | 1853       | 6591       | 7231       | 6368       | 8818       |
| WCVW Total | 27956      | 20088      | 21116      | 22806      | 21330      | 24312      | 28046      | 29394      |
| WDCN Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| WDIQ Total | 0          | 701        | 684        | 607        | 615        | 641        | 952        | 953        |
| WDPB Total | 41444      | 41749      | 42307      | 55060      | 55548      | 56768      | 57993      | 62168      |
| WDSE Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| WEAO Total | 34508      | 18655      | 23697      | 104830     | 113170     | 116760     | 25017      | 26124      |
| WEDH Total | 40055      | 40712      | 40869      | 41578      | 42045      | 41829      | 42393      | 43324      |
| WEDN Total | 117468     | 120832     | 154231     | 155961     | 162619     | 187211     | 183383     | 193290     |
| WEDU Total | 237        | 237        | 504        | 237        | 237        | 237        | 237        | 237        |
| WEDW Total | 301528     | 308405     | 323369     | 328340     | 367467     | 373471     | 397454     | 403685     |
| WEDY Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| WEIQ Total | 20731      | 20675      | 16508      | 16862      | 17433      | 19818      | 19173      | 19641      |
| WEKW Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| WENH Total | 29121      | 30267      | 31513      | 31548      | 0          | 0          | 0          | 1829       |

Exhibit A

**Drop Summary**  
**Only Those Systems Within 50 Miles Included**

| Call       | dropped881 | dropped882 | dropped891 | dropped892 | dropped901 | dropped902 | dropped911 | dropped912 |
|------------|------------|------------|------------|------------|------------|------------|------------|------------|
| WETA Total | 529        | 683        | 659        | 181        | 529        | 529        | 529        | 529        |
| WETK Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| WFIQ Total | 757        | 1183       | 1126       | 1160       | 757        | 655        | 919        | 919        |
| WFPT Total | 0          | 0          | 0          | 1004       | 1004       | 0          | 0          | 0          |
| WFSG Total | 5510       | 0          | 0          | 0          | 0          | 6371       | 6833       | 7040       |
| WFSU Total | 0          | 1193       | 1202       | 1171       | 1147       | 1242       | 1427       | 1373       |
| WFUM Total | 6451       | 6321       | 7226       | 7448       | 6860       | 6823       | 6743       | 6705       |
| WFWA Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 199        |
| WFYI Total | 1563       | 1912       | 919        | 892        | 1270       | 1265       | 918        | 8225       |
| WGBH Total | 0          | 220        | 443        | 0          | 0          | 0          | 0          | 0          |
| WGBX Total | 50651      | 53152      | 82272      | 83522      | 94531      | 98154      | 100736     | 102381     |
| WGBY Total | 0          | 0          | 0          | 0          | 24958      | 29434      | 27786      | 29483      |
| WGIQ Total | 0          | 0          | 0          | 2596       | 0          | 8205       | 12233      | 12038      |
| WGPT Total | 0          | 0          | 2908       | 2908       | 2908       | 2968       | 3003       | 2971       |
| WGTE Total | 432        | 424        | 0          | 0          | 0          | 59         | 87         | 69         |
| WGTV Total | 0          | 0          | 868        | 933        | 1096       | 1247       | 1342       | 571        |
| WGVK Total | 2284       | 2220       | 2363       | 2463       | 1379       | 0          | 0          | 0          |
| WGVU Total | 302        | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| WHA Total  | 0          | 0          | 0          | 0          | 0          | 861        | 1052       | 918        |
| WHED Total | 350        | 382        | 352        | 353        | 348        | 355        | 327        | 342        |
| WHIQ Total | 14089      | 14646      | 14827      | 15757      | 15622      | 15874      | 17192      | 17505      |
| WHLA Total | 0          | 0          | 0          | 0          | 318        | 473        | 469        | 380        |
| WHMM Total | 529        | 652        | 529        | 0          | 589        | 529        | 682        | 529        |
| WHRM Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| WHRO Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| WHWC Total | 83         | 83         | 0          | 0          | 0          | 106        | 106        | 384        |
| WHYY Total | 1109       | 3600       | 3732       | 405        | 405        | 604        | 555        | 555        |
| WIIQ Total | 1551       | 2015       | 2042       | 2053       | 2138       | 2217       | 2236       | 2217       |
| WILL Total | 66         | 66         | 322        | 773        | 860        | 342        | 885        | 806        |
| WIPB Total | 4850       | 4860       | 5037       | 0          | 0          | 0          | 1898       | 4898       |
| WIPR Total | 0          | 0          | 882        | 481        | 931        | 891        | 969        | 979        |
| WITF Total | 9214       | 9739       | 10360      | 10986      | 11433      | 71367      | 71465      | 13334      |
| WITV Total | 0          | 0          | 0          | 224        | 195        | 0          | 135        | 129        |
| WJCT Total | 0          | 0          | 457        | 578        | 1496       | 1508       | 1489       | 1592       |
| WJPM Total | 20842      | 0          | 0          | 0          | 0          | 0          | 0          | 1036       |
| WJPT Total | 0          | 0          | 0          | 4345       | 51709      | 52063      | 49243      | 50062      |
| WJSP Total | 10336      | 11265      | 0          | 0          | 0          | 607        | 656        | 665        |
| WJWJ Total | 1042       | 1039       | 0          | 0          | 0          | 0          | 0          | 0          |
| WKAR Total | 21820      | 22469      | 22472      | 24444      | 28852      | 53462      | 50896      | 77356      |
| WKAS Total | 696        | 2404       | 2446       | 3376       | 3092       | 3026       | 3318       | 3129       |
| WKGB Total | 7239       | 7326       | 7394       | 6726       | 7104       | 7367       | 7588       | 2800       |
| WKHA Total | 950        | 771        | 1078       | 1054       | 1073       | 0          | 1092       | 0          |
| WKLE Total | 131        | 137        | 341        | 276        | 0          | 0          | 0          | 0          |
| WKMA Total | 18915      | 19465      | 19846      | 20259      | 20702      | 20937      | 20774      | 20387      |
| WKMJ Total | 2254       | 2412       | 2514       | 2756       | 2698       | 2721       | 2854       | 2911       |
| WKMR Total | 2943       | 768        | 788        | 3145       | 61         | 1767       | 1778       | 4053       |
| WKMU Total | 25899      | 28022      | 28076      | 27868      | 28972      | 28906      | 22462      | 30895      |
| WKNO Total | 143        | 197        | 1021       | 1657       | 1712       | 1323       | 3036       | 3128       |
| WKOH Total | 19733      | 19995      | 21025      | 21735      | 0          | 0          | 1667       | 1803       |
| WKON Total | 11804      | 12745      | 11324      | 11412      | 9116       | 9486       | 9380       | 9553       |

Exhibit A

**Drop Summary**  
**Only Those Systems Within 50 Miles Included**

| Call       | dropped881 | dropped882 | dropped891 | dropped892 | dropped901 | dropped902 | dropped911 | dropped912 |
|------------|------------|------------|------------|------------|------------|------------|------------|------------|
| WKPC Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| WKPD Total | 802        | 846        | 661        | 908        | 1335       | 1481       | 1379       | 1346       |
| WKPI Total | 3111       | 2178       | 2032       | 1613       | 1640       | 1899       | 1906       | 1085       |
| WKSO Total | 0          | 1000       | 2813       | 2125       | 2800       | 1350       | 3602       | 3653       |
| WKZT Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| WLAE Total | 23442      | 23480      | 47222      | 44784      | 20608      | 19311      | 18513      | 20854      |
| WLED Total | 4220       | 4436       | 4436       | 4478       | 4648       | 4579       | 4465       | 4572       |
| WLEF Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| WLIW Total | 110596     | 113197     | 115994     | 113148     | 115514     | 119936     | 122114     | 124648     |
| WLJT Total | 0          | 0          | 0          | 0          | 961        | 974        | 1021       | 1022       |
| WLPB Total | 625        | 271        | 0          | 0          | 0          | 0          | 0          | 0          |
| WLRN Total | 51967      | 54527      | 45701      | 48515      | 44712      | 47156      | 44400      | 47666      |
| WLVT Total | 108365     | 116675     | 119230     | 125806     | 106353     | 114058     | 121781     | 124619     |
| WMAB Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| WMAE Total | 13165      | 13732      | 14303      | 14335      | 14754      | 14670      | 15031      | 15518      |
| WMAH Total | 404        | 413        | 428        | 0          | 0          | 0          | 0          | 0          |
| WMAO Total | 167        | 0          | 946        | 232        | 216        | 212        | 220        | 239        |
| WMAV Total | 0          | 0          | 0          | 0          | 2323       | 2598       | 863        | 0          |
| WMAW Total | 0          | 406        | 546        | 2032       | 783        | 2164       | 2250       | 2207       |
| WMEA Total | 7718       | 7676       | 0          | 8347       | 8838       | 0          | 0          | 0          |
| WMEB Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| WMEC Total | 0          | 1080       | 1093       | 0          | 0          | 0          | 0          | 0          |
| WMEG Total | 57979      | 65119      | 72482      | 75621      | 162598     | 157916     | 170380     | 166083     |
| WMEM Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 415        |
| WMFE Total | 0          | 100        | 206        | 206        | 206        | 206        | 206        | 376        |
| WMHT Total | 0          | 39         | 187        | 328        | 192        | 219        | 220        | 423        |
| WMPB Total | 58389      | 82957      | 97314      | 136371     | 126313     | 139384     | 344660     | 350133     |
| WMPN Total | 501        | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| WMPT Total | 23041      | 27276      | 30023      | 31369      | 43293      | 42607      | 36210      | 2494       |
| WMTJ Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| WMVS Total | 0          | 119        | 119        | 119        | 119        | 284        | 284        | 119        |
| WMVT Total | 177        | 173        | 0          | 0          | 0          | 49         | 49         | 0          |
| WNED Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| WNEO Total | 7499       | 7354       | 66         | 604        | 0          | 2018       | 101430     | 104414     |
| WNET Total | 5840       | 8503       | 7040       | 7350       | 8124       | 8808       | 9450       | 0          |
| WNIN Total | 190        | 197        | 302        | 315        | 358        | 409        | 424        | 397        |
| WNIT Total | 15271      | 16083      | 16891      | 17695      | 18141      | 19020      | 19236      | 21371      |
| WNJB Total | 61225      | 66552      | 71507      | 117157     | 123238     | 124835     | 129915     | 131896     |
| WNJM Total | 822095     | 877206     | 883516     | 848491     | 921819     | 1024296    | 922074     | 933108     |
| WNJS Total | 201038     | 214835     | 106551     | 112726     | 112216     | 117755     | 121359     | 125407     |
| WNJT Total | 98587      | 79595      | 76695      | 75334      | 82840      | 294865     | 304245     | 128928     |
| WNMU Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| WNPB Total | 25829      | 30700      | 34083      | 25316      | 29492      | 35373      | 24439      | 40118      |
| WNPE Total | 1842       | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| WNTV Total | 438        | 409        | 596        | 563        | 7438       | 7693       | 8710       | 8629       |
| WNVC Total | 144656     | 132413     | 151715     | 206843     | 204007     | 228081     | 239633     | 256046     |
| WNVT Total | 529        | 652        | 529        | 0          | 589        | 529        | 682        | 529        |
| WNYC Total | 177416     | 184287     | 175762     | 169730     | 364083     | 369202     | 370608     | 378445     |
| WNYE Total | 1297498    | 1343000    | 1387692    | 1415890    | 1458544    | 1551948    | 1489378    | 1530637    |
| WOSU Total | 63         | 0          | 0          | 0          | 0          | 426        | 429        | 0          |

Exhibit A

**Drop Summary**  
**Only Those Systems Within 50 Miles Included**

| Call       | dropped881 | dropped882 | dropped891 | dropped892 | dropped901 | dropped902 | dropped911 | dropped912 |
|------------|------------|------------|------------|------------|------------|------------|------------|------------|
| WOUB Total | 1469       | 2731       | 2750       | 2456       | 2572       | 2559       | 2522       | 2506       |
| WOUC Total | 7144       | 6954       | 6828       | 14562      | 13322      | 13327      | 14692      | 14720      |
| WPBA Total | 1466       | 516        | 204        | 2599       | 7595       | 8746       | 2391       | 10232      |
| WPBO Total | 0          | 1188       | 1398       | 1536       | 1609       | 2103       | 2156       | 2139       |
| WPBT Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| WPBY Total | 410        | 715        | 1396       | 786        | 804        | 851        | 844        | 819        |
| WPNE Total | 0          | 98         | 0          | 0          | 0          | 0          | 321        | 321        |
| WPSX Total | 2314       | 1085       | 1096       | 1093       | 1092       | 1104       | 1099       | 1092       |
| WPTD Total | 6883       | 39036      | 42229      | 42631      | 8152       | 8560       | 10353      | 11530      |
| WPTO Total | 226147     | 234231     | 240908     | 267609     | 304401     | 312759     | 317529     | 322186     |
| WQEC Total | 254        | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| WQED Total | 14729      | 9366       | 7115       | 7046       | 7084       | 7115       | 7582       | 7594       |
| WQEX Total | 66867      | 15373      | 16154      | 16028      | 16057      | 16308      | 16159      | 15885      |
| WQLN Total | 1375       | 1381       | 1375       | 1383       | 1389       | 1390       | 1490       | 1451       |
| WQPT Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| WRES Total | 87023      | 91806      | 100151     | 102725     | 105577     | 98257      | 0          | 100754     |
| WRET Total | 438        | 409        | 596        | 0          | 795        | 859        | 1069       | 1005       |
| WRJA Total | 1987       | 1867       | 75171      | 76161      | 78287      | 77792      | 80092      | 79505      |
| WRLK Total | 4416       | 4598       | 4752       | 4994       | 11920      | 14963      | 4985       | 4734       |
| WSBE Total | 148038     | 156456     | 161453     | 173346     | 190246     | 191368     | 224747     | 235988     |
| WSBN Total | 4221       | 13687      | 14281      | 14320      | 27164      | 27402      | 24766      | 25077      |
| WSFP Total | 940        | 0          | 0          | 31         | 174        | 0          | 0          | 0          |
| WSIU Total | 1205       | 1259       | 2579       | 1880       | 1376       | 2128       | 2193       | 2231       |
| WSJK Total | 2759       | 4032       | 4294       | 4294       | 4202       | 4250       | 7522       | 10590      |
| WSKG Total | 0          | 936        | 948        | 942        | 958        | 960        | 969        | 1263       |
| WSRE Total | 716        | 0          | 0          | 0          | 0          | 0          | 220        | 975        |
| WSWP Total | 140        | 0          | 0          | 0          | 0          | 201        | 201        | 201        |
| WTCI Total | 19964      | 12565      | 12277      | 12365      | 0          | 0          | 0          | 0          |
| WTIU Total | 0          | 2988       | 106472     | 181588     | 187011     | 190114     | 191978     | 194976     |
| WTJX Total | 0          | 0          | 882        | 0          | 0          | 891        | 969        | 979        |
| WTTW Total | 256        | 256        | 256        | 256        | 468        | 456        | 253        | 926        |
| WTVI Total | 0          | 0          | 0          | 0          | 16935      | 22805      | 24003      | 24183      |
| WTVP Total | 441        | 566        | 634        | 522        | 513        | 457        | 544        | 558        |
| WTVS Total | 223        | 0          | 0          | 0          | 0          | 0          | 25622      | 26375      |
| WUCM Total | 6603       | 7569       | 7570       | 8589       | 10442      | 90946      | 93080      | 93550      |
| WUFT Total | 0          | 0          | 317        | 326        | 0          | 0          | 0          | 0          |
| WUNC Total | 47567      | 48423      | 50492      | 51432      | 53504      | 60256      | 60160      | 54457      |
| WUND Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| WUNE Total | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          |
| WUNF Total | 351        | 386        | 347        | 368        | 337        | 364        | 367        | 421        |
| WUNG Total | 4089       | 5300       | 8556       | 9730       | 3252       | 3042       | 3247       | 3297       |
| WUNJ Total | 1592       | 1566       | 1785       | 1538       | 5668       | 3665       | 4164       | 5005       |
| WUNK Total | 0          | 0          | 0          | 162        | 363        | 289        | 300        | 286        |
| WUNL Total | 0          | 0          | 762        | 786        | 720        | 786        | 435        | 422        |
| WUNM Total | 125        | 129        | 160        | 0          | 363        | 289        | 300        | 286        |
| WUNP Total | 263        | 518        | 0          | 0          | 1369       | 1272       | 0          | 0          |
| WUSF Total | 0          | 0          | 282        | 245        | 238        | 259        | 265        | 275        |
| WUSI Total | 3955       | 5338       | 5504       | 5041       | 5043       | 4973       | 5031       | 5008       |
| WVAN Total | 1761       | 1815       | 1660       | 1488       | 1503       | 1457       | 1755       | 5502       |
| WVER Total | 3598       | 3701       | 3870       | 3890       | 4030       | 4324       | 4406       | 4449       |

Exhibit A

**Drop Summary**  
**Only Those Systems Within 50 Miles Included**

| Call               | dropped881     | dropped882     | dropped891     | dropped892     | dropped901     | dropped902     | dropped911     | dropped912     |
|--------------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|
| <b>WVIA Total</b>  | 59601          | 60304          | 61490          | 61733          | 61982          | 62204          | 61190          | 61623          |
| <b>WVIZ Total</b>  | 48695          | 48566          | 53063          | 55536          | 55476          | 56115          | 43819          | 43779          |
| <b>WVPT Total</b>  | 0              | 0              | 0              | 0              | 0              | 0              | 861            | 860            |
| <b>WVTA Total</b>  | 2412           | 1962           | 1098           | 1019           | 1152           | 1162           | 1242           | 1104           |
| <b>WVUT Total</b>  | 7575           | 6190           | 6176           | 6113           | 9589           | 9694           | 9683           | 19391          |
| <b>WWPB Total</b>  | 683            | 681            | 668            | 665            | 667            | 677            | 650            | 664            |
| <b>WXEL Total</b>  | 71316          | 74927          | 46786          | 49714          | 45640          | 48173          | 44620          | 47886          |
| <b>WXGA Total</b>  | 4300           | 3658           | 4435           | 4527           | 4438           | 0              | 4816           | 6109           |
| <b>WYCC Total</b>  | 91827          | 95788          | 98285          | 102346         | 68131          | 72282          | 68835          | 70937          |
| <b>WYES Total</b>  | 0              | 0              | 0              | 172            | 147            | 119            | 140            | 131            |
| <b>Grand Total</b> | <b>6456499</b> | <b>6775512</b> | <b>7300581</b> | <b>7870190</b> | <b>8590159</b> | <b>9456553</b> | <b>9585789</b> | <b>9720181</b> |

Exhibit A

**Drop Summary**  
**Only Those Systems Within 50 Miles Included**

| Call        | dropped921 | dropped922 | dropped931 | dropped932 | dropped941 |
|-------------|------------|------------|------------|------------|------------|
| KAKM Total  | 0          | 0          | 0          | 0          | 0          |
| KAMU Total  | 641        | 704        | 646        | 702        | 678        |
| Kawe Total  | 0          | 0          | 0          | 0          | 0          |
| KBDI Total  | 6421       | 5790       | 6182       | 2660       | 2832       |
| KBHE Total  | 2984       | 2889       | 2951       | 2869       | 2980       |
| KBIN Total  | 84644      | 86460      | 87197      | 91780      | 93526      |
| KBME Total  | 75         | 0          | 0          | 0          | 0          |
| KBTC Total  | 22990      | 24120      | 24443      | 24517      | 24613      |
| KBYU Total  | 4542       | 4904       | 870        | 672        | 705        |
| KCET Total  | 0          | 0          | 0          | 0          | 0          |
| KCKA Total  | 19301      | 19917      | 20122      | 19413      | 19436      |
| KCOS Total  | 0          | 0          | 0          | 0          | 0          |
| KCPT Total  | 199        | 197        | 200        | 0          | 0          |
| KCSM Total  | 429949     | 430472     | 428325     | 97112      | 127729     |
| KCTS Total  | 61         | 130        | 143        | 146        | 234        |
| KCWC Total  | 0          | 0          | 0          | 0          | 0          |
| KDIN Total  | 816        | 0          | 0          | 0          | 0          |
| KDSD Total  | 742        | 745        | 757        | 770        | 774        |
| KDSE Total  | 94         | 93         | 94         | 90         | 90         |
| KDTN Total  | 0          | 0          | 0          | 0          | 0          |
| KEDT Total  | 0          | 0          | 0          | 0          | 0          |
| KEMV Total  | 2391       | 3573       | 185        | 195        | 189        |
| KENW Total  | 1621       | 1643       | 1640       | 1617       | 1584       |
| KERA Total  | 1508       | 1274       | 0          | 0          | 0          |
| KESD Total  | 701        | 542        | 537        | 254        | 262        |
| KETA Total  | 1630       | 333        | 164        | 150        | 154        |
| KETC Total  | 311        | 291        | 302        | 0          | 0          |
| KETG Total  | 0          | 0          | 0          | 0          | 0          |
| KETH Total  | 646        | 680        | 724        | 785        | 728        |
| KETS Total  | 460        | 495        | 0          | 0          | 0          |
| KFME Total  | 30         | 31         | 0          | 0          | 0          |
| KGTF Total  | 0          | 0          | 0          | 0          | 0          |
| KHET Total  | 0          | 0          | 0          | 0          | 0          |
| KHIN Total  | 2334       | 2355       | 2401       | 1585       | 1580       |
| KHNE Total  | 944        | 840        | 0          | 0          | 0          |
| KIDZ Total  | 6896       | 6959       | 7233       | 7476       | 7255       |
| KIIN Total  | 236        | 0          | 0          | 0          | 0          |
| KISU Total  | 0          | 0          | 0          | 0          | 0          |
| KIXE Total  | 0          | 0          | 0          | 0          | 0          |
| KLCS Total  | 329109     | 327450     | 200276     | 152241     | 137209     |
| KLEP Total  | 4633       | 4727       | 4679       | 4697       | 4683       |
| KLNE Total  | 8448       | 8064       | 7903       | 8168       | 8337       |
| KLPB Total  | 252        | 263        | 257        | 0          | 0          |
| KLRN Total  | 9397       | 10081      | 11354      | 10786      | 10860      |
| KLRU Total  | 168        | 111        | 140        | 138        | 100        |
| KLTJ Total  | 0          | 0          | 0          | 0          | 0          |
| KLTM Total  | 3382       | 0          | 0          | 0          | 0          |
| KLTS Total  | 762        | 771        | 817        | 979        | 760        |
| KL VX Total | 0          | 0          | 0          | 0          | 0          |
| KMBH Total  | 0          | 0          | 0          | 0          | 0          |

Exhibit A

**Drop Summary**  
**Only Those Systems Within 50 Miles Included**

| Call       | dropped921 | dropped922 | dropped931 | dropped932 | dropped941 |
|------------|------------|------------|------------|------------|------------|
| KMEB Total | 16381      | 16743      | 17221      | 17731      | 18205      |
| KMNE Total | 0          | 0          | 0          | 0          | 0          |
| KMOS Total | 1910       | 1939       | 294        | 284        | 0          |
| KMTP Total | 710908     | 718294     | 694162     | 620742     | 617790     |
| KNCT Total | 49467      | 52539      | 52391      | 55434      | 56256      |
| KNME Total | 0          | 0          | 0          | 0          | 0          |
| KNPB Total | 100        | 0          | 179        | 0          | 0          |
| KNXT Total | 236        | 199        | 212        | 226        | 207        |
| KOAC Total | 47784      | 48921      | 49900      | 50389      | 51162      |
| KOCE Total | 145913     | 150739     | 123343     | 113150     | 28953      |
| KOED Total | 95         | 0          | 0          | 0          | 0          |
| KOET Total | 1278       | 933        | 925        | 909        | 946        |
| KOOD Total | 0          | 0          | 0          | 0          | 0          |
| KOPB Total | 0          | 0          | 0          | 0          | 0          |
| KOZJ Total | 0          | 0          | 0          | 0          | 0          |
| KOZK Total | 0          | 0          | 0          | 0          | 0          |
| KPBS Total | 338        | 0          | 0          | 0          | 0          |
| KPNE Total | 1158       | 1168       | 518        | 523        | 0          |
| KPTS Total | 0          | 0          | 0          | 0          | 0          |
| KQED Total | 461        | 461        | 309        | 0          | 0          |
| KRCB Total | 26536      | 25184      | 25455      | 0          | 0          |
| KRIN Total | 3299       | 1974       | 1942       | 2326       | 2372       |
| KRMA Total | 474        | 474        | 474        | 475        | 107        |
| KRNE Total | 400        | 408        | 404        | 0          | 397        |
| KRWG Total | 585        | 615        | 0          | 708        | 730        |
| KSIN Total | 363        | 473        | 449        | 144        | 143        |
| KSMQ Total | 0          | 0          | 0          | 0          | 0          |
| KSPS Total | 0          | 0          | 0          | 0          | 0          |
| KSRE Total | 0          | 0          | 0          | 0          | 0          |
| KSWK Total | 0          | 0          | 0          | 0          | 0          |
| KSYS Total | 0          | 0          | 0          | 302        | 291        |
| KTCA Total | 0          | 0          | 0          | 0          | 0          |
| KTCI Total | 1832       | 1916       | 1951       | 0          | 0          |
| KTEH Total | 57289      | 58465      | 58302      | 12369      | 12904      |
| KTEJ Total | 1472       | 1465       | 0          | 0          | 0          |
| KTIN Total | 2669       | 2691       | 2672       | 2658       | 2666       |
| KTLC Total | 1567       | 489        | 238        | 243        | 241        |
| KTNE Total | 0          | 0          | 0          | 0          | 0          |
| KTOO Total | 0          | 0          | 0          | 0          | 0          |
| KTSC Total | 437        | 457        | 195        | 0          | 0          |
| KTSD Total | 0          | 0          | 0          | 0          | 0          |
| KTVR Total | 7038       | 526        | 0          | 0          | 0          |
| KTWU Total | 11522      | 569        | 566        | 619        | 0          |
| KTXT Total | 0          | 0          | 0          | 190        | 181        |
| KUAC Total | 0          | 0          | 0          | 0          | 0          |
| KUCU Total | 1556       | 1556       | 1569       | 1569       | 1666       |
| KUED Total | 0          | 0          | 0          | 0          | 0          |
| KUHT Total | 243        | 243        | 1397       | 243        | 0          |
| KUID Total | 251        | 251        | 265        | 268        | 276        |
| KULC Total | 35         | 0          | 0          | 0          | 0          |



Exhibit A

**Drop Summary**  
**Only Those Systems Within 50 Miles Included**

| Call       | dropped921 | dropped922 | dropped931 | dropped932 | dropped941 |
|------------|------------|------------|------------|------------|------------|
| KUON Total | 50391      | 50759      | 50541      | 32101      | 32592      |
| KUSD Total | 460        | 453        | 459        | 205        | 0          |
| KVCR Total | 293944     | 203345     | 203479     | 141502     | 170497     |
| KVDO Total | 5069       | 5168       | 4996       | 5197       | 5236       |
| KVIE Total | 24370      | 25282      | 25026      | 0          | 0          |
| KVPT Total | 0          | 0          | 0          | 0          | 0          |
| KWCM Total | 0          | 0          | 0          | 0          | 0          |
| KWET Total | 1419       | 1690       | 601        | 506        | 612        |
| KWSE Total | 0          | 0          | 0          | 0          | 0          |
| KWSU Total | 953        | 1001       | 1049       | 962        | 984        |
| KXNE Total | 1485       | 1490       | 789        | 798        | 815        |
| KXON Total | 369        | 0          | 361        | 356        | 370        |
| KYIN Total | 0          | 0          | 0          | 0          | 0          |
| KYNE Total | 219        | 222        | 217        | 226        | 232        |
| KYUK Total | 52         | 52         | 52         | 0          | 52         |
| KYVE Total | 0          | 0          | 0          | 0          | 0          |
| KZSD Total | 750        | 755        | 739        | 750        | 737        |
| WABW Total | 652        | 643        | 669        | 0          | 0          |
| WBGU Total | 8161       | 8616       | 8450       | 8732       | 8738       |
| WBIQ Total | 6083       | 6138       | 152        | 0          | 5299       |
| WBRA Total | 5193       | 1187       | 5216       | 5217       | 5255       |
| WCAE Total | 107885     | 110883     | 112479     | 112734     | 114481     |
| WCBB Total | 0          | 0          | 0          | 0          | 0          |
| WCES Total | 2474       | 2426       | 431        | 524        | 534        |
| WCET Total | 209997     | 210183     | 209960     | 51767      | 52186      |
| WCFE Total | 1321       | 1314       | 1366       | 1396       | 1389       |
| WCIQ Total | 9402       | 9514       | 14364      | 14719      | 9664       |
| WCLP Total | 6294       | 6622       | 6714       | 7348       | 7433       |
| WCML Total | 0          | 0          | 0          | 0          | 0          |
| WCMU Total | 322        | 343        | 364        | 362        | 374        |
| WCMV Total | 1888       | 1992       | 2010       | 2062       | 2150       |
| WCNY Total | 299        | 294        | 309        | 294        | 302        |
| WCPB Total | 3734       | 3873       | 3950       | 4188       | 4266       |
| WCTE Total | 1710       | 1740       | 1788       | 1825       | 1838       |
| WCVI Total | 0          | 1250       | 1100       | 1100       | 0          |
| WCVN Total | 9190       | 9791       | 10579      | 11188      | 11699      |
| WCVW Total | 28229      | 27862      | 28246      | 29252      | 28541      |
| WDCN Total | 0          | 0          | 0          | 0          | 0          |
| WDIQ Total | 901        | 935        | 924        | 900        | 699        |
| WDPB Total | 67613      | 62736      | 48471      | 44506      | 46001      |
| WDSE Total | 0          | 0          | 0          | 0          | 0          |
| WEAO Total | 27164      | 25955      | 22278      | 4396       | 176        |
| WEDH Total | 44164      | 43812      | 44547      | 44935      | 45978      |
| WEDN Total | 244762     | 244881     | 251194     | 255321     | 261394     |
| WEDU Total | 237        | 237        | 237        | 237        | 0          |
| WEDW Total | 435220     | 442130     | 446825     | 437676     | 444645     |
| WEDY Total | 0          | 0          | 0          | 0          | 0          |
| WEIQ Total | 20229      | 20312      | 20976      | 20674      | 21610      |
| WEKW Total | 0          | 0          | 0          | 0          | 0          |
| WENH Total | 1843       | 0          | 0          | 0          | 0          |

Exhibit A

**Drop Summary**  
**Only Those Systems Within 50 Miles Included**

| Call       | dropped921 | dropped922 | dropped931 | dropped932 | dropped941 |
|------------|------------|------------|------------|------------|------------|
| WETA Total | 529        | 529        | 529        | 0          | 0          |
| WETK Total | 0          | 0          | 0          | 0          | 0          |
| WFIQ Total | 768        | 725        | 703        | 823        | 819        |
| WFPT Total | 1978       | 2228       | 0          | 0          | 0          |
| WFSG Total | 0          | 0          | 0          | 0          | 0          |
| WFSU Total | 1394       | 1412       | 1439       | 1447       | 1420       |
| WFUM Total | 6251       | 6033       | 6579       | 186        | 0          |
| WFWA Total | 327        | 333        | 0          | 0          | 0          |
| WFYI Total | 8314       | 8308       | 7430       | 0          | 0          |
| WGBH Total | 0          | 0          | 0          | 0          | 0          |
| WGBX Total | 59742      | 60984      | 62004      | 39066      | 39675      |
| WGBY Total | 28938      | 30537      | 27224      | 29554      | 28596      |
| WGIQ Total | 12073      | 12314      | 12321      | 3874       | 3980       |
| WGPT Total | 3032       | 277        | 275        | 277        | 334        |
| WGTE Total | 89         | 71         | 94         | 0          | 0          |
| WGTV Total | 488        | 497        | 0          | 0          | 0          |
| WGVK Total | 542        | 491        | 496        | 483        | 500        |
| WGVU Total | 0          | 0          | 0          | 0          | 0          |
| WHA Total  | 0          | 913        | 0          | 880        | 0          |
| WHED Total | 327        | 398        | 371        | 432        | 376        |
| WHIQ Total | 16562      | 17215      | 17607      | 18065      | 18495      |
| WHLA Total | 308        | 311        | 314        | 324        | 323        |
| WHMM Total | 529        | 529        | 529        | 0          | 0          |
| WHRM Total | 0          | 0          | 0          | 0          | 0          |
| WHRO Total | 0          | 0          | 0          | 0          | 0          |
| WHWC Total | 275        | 0          | 0          | 0          | 0          |
| WHYY Total | 555        | 317        | 317        | 317        | 150        |
| WIIQ Total | 2249       | 2213       | 2257       | 0          | 0          |
| WILL Total | 72         | 73         | 80         | 97         | 96         |
| WIPB Total | 4946       | 4997       | 1975       | 0          | 0          |
| WIPR Total | 1048       | 980        | 959        | 1010       | 1022       |
| WITF Total | 13785      | 14282      | 14718      | 14490      | 14880      |
| WITV Total | 0          | 0          | 0          | 0          | 0          |
| WJCT Total | 1601       | 1410       | 1693       | 691        | 683        |
| WJPM Total | 26031      | 26453      | 27295      | 27407      | 27942      |
| WJPT Total | 54011      | 57817      | 58200      | 61768      | 59236      |
| WJSP Total | 695        | 705        | 727        | 731        | 751        |
| WJWJ Total | 0          | 0          | 0          | 0          | 0          |
| WKAR Total | 78867      | 28703      | 29952      | 4320       | 4367       |
| WKAS Total | 3613       | 1099       | 810        | 381        | 927        |
| WKGB Total | 2885       | 2943       | 2988       | 3018       | 3120       |
| WKHA Total | 0          | 0          | 0          | 0          | 0          |
| WKLE Total | 0          | 0          | 0          | 0          | 0          |
| WKMA Total | 20535      | 20779      | 20823      | 20216      | 20520      |
| WKMJ Total | 2963       | 2872       | 3377       | 3270       | 3297       |
| WKMR Total | 4074       | 1868       | 1932       | 1913       | 1996       |
| WKMU Total | 30618      | 31291      | 31377      | 31695      | 31685      |
| WKNO Total | 3240       | 3447       | 3563       | 162        | 80         |
| WKOH Total | 21945      | 22221      | 22000      | 0          | 0          |
| WKON Total | 12767      | 12991      | 9068       | 10175      | 9903       |

Exhibit A

**Drop Summary**  
**Only Those Systems Within 50 Miles Included**

| Call       | dropped921 | dropped922 | dropped931 | dropped932 | dropped941 |
|------------|------------|------------|------------|------------|------------|
| WKPC Total | 0          | 1821       | 0          | 0          | 0          |
| WKPD Total | 1396       | 1247       | 1227       | 1431       | 952        |
| WKPI Total | 2182       | 2123       | 2333       | 2079       | 2643       |
| WKSO Total | 1000       | 1000       | 1180       | 1000       | 1000       |
| WKZT Total | 0          | 0          | 0          | 0          | 0          |
| WLAE Total | 21392      | 21682      | 22613      | 24454      | 24965      |
| WLED Total | 4490       | 4531       | 5163       | 5555       | 7257       |
| WLEF Total | 0          | 0          | 0          | 0          | 0          |
| WLIW Total | 125963     | 127944     | 129425     | 130587     | 132193     |
| WLJT Total | 1021       | 1080       | 1085       | 1187       | 1212       |
| WLPB Total | 0          | 0          | 0          | 0          | 0          |
| WLRN Total | 45551      | 49880      | 0          | 0          | 0          |
| WLVT Total | 128515     | 135746     | 139263     | 138706     | 142072     |
| WMAB Total | 0          | 0          | 0          | 0          | 0          |
| WMAE Total | 15845      | 15863      | 16344      | 17288      | 17600      |
| WMAH Total | 0          | 0          | 0          | 0          | 0          |
| WMAO Total | 518        | 264        | 277        | 0          | 0          |
| WMAV Total | 0          | 0          | 0          | 0          | 0          |
| WMAW Total | 623        | 613        | 646        | 640        | 645        |
| WMEA Total | 0          | 0          | 0          | 0          | 0          |
| WMEB Total | 0          | 0          | 0          | 0          | 0          |
| WMEC Total | 0          | 0          | 0          | 0          | 0          |
| WMEG Total | 175153     | 172647     | 183195     | 175230     | 182062     |
| WMEM Total | 418        | 0          | 0          | 0          | 0          |
| WMFE Total | 443        | 270        | 75         | 76         | 89         |
| WMHT Total | 357        | 436        | 0          | 0          | 0          |
| WMPB Total | 356963     | 358880     | 373070     | 367001     | 370038     |
| WMPN Total | 0          | 0          | 0          | 0          | 0          |
| WMPT Total | 39981      | 42054      | 529        | 0          | 0          |
| WMTJ Total | 0          | 0          | 0          | 0          | 0          |
| WMVS Total | 119        | 117        | 118        | 120        | 116        |
| WMVT Total | 0          | 0          | 0          | 0          | 0          |
| WNED Total | 0          | 0          | 0          | 0          | 0          |
| WNEO Total | 97884      | 108396     | 102878     | 106537     | 109041     |
| WNET Total | 0          | 0          | 0          | 0          | 0          |
| WNIN Total | 387        | 413        | 434        | 115        | 48         |
| WNIT Total | 22069      | 22709      | 21589      | 21108      | 21883      |
| WNJB Total | 136266     | 141924     | 148413     | 149727     | 105086     |
| WNJM Total | 960457     | 1004088    | 957901     | 494023     | 553901     |
| WNJS Total | 127759     | 129785     | 84590      | 59220      | 59305      |
| WNJT Total | 325689     | 325639     | 295701     | 28969      | 29621      |
| WNMU Total | 0          | 0          | 0          | 0          | 0          |
| WNPB Total | 38535      | 39267      | 39003      | 32008      | 40066      |
| WNPE Total | 0          | 0          | 0          | 0          | 0          |
| WNTV Total | 9183       | 9263       | 9677       | 9507       | 9928       |
| WNVC Total | 319694     | 333060     | 338577     | 169306     | 171324     |
| WNVN Total | 2088       | 2098       | 2201       | 0          | 0          |
| WNYC Total | 420912     | 425291     | 398569     | 256433     | 260681     |
| WNYE Total | 1558489    | 1579602    | 1588952    | 1414053    | 1408947    |
| WOSU Total | 0          | 0          | 0          | 0          | 0          |

Exhibit A

**Drop Summary**  
**Only Those Systems Within 50 Miles Included**

| Call       | dropped921 | dropped922 | dropped931 | dropped932 | dropped941 |
|------------|------------|------------|------------|------------|------------|
| WOUB Total | 2578       | 2041       | 2054       | 2055       | 2032       |
| WOUC Total | 14942      | 15109      | 15419      | 15397      | 8429       |
| WPBA Total | 1607       | 1623       | 1309       | 1149       | 1221       |
| WPBO Total | 2057       | 2074       | 2178       | 2256       | 2295       |
| WPBT Total | 0          | 0          | 0          | 0          | 0          |
| WPBY Total | 934        | 742        | 726        | 737        | 745        |
| WPNE Total | 321        | 98         | 98         | 98         | 0          |
| WPSX Total | 1121       | 1118       | 1138       | 1130       | 1216       |
| WPTD Total | 11215      | 9813       | 9386       | 6483       | 0          |
| WPTO Total | 418163     | 411353     | 406834     | 0          | 0          |
| WQEC Total | 0          | 0          | 0          | 0          | 0          |
| WQED Total | 8892       | 9187       | 8255       | 8330       | 8464       |
| WQEX Total | 16252      | 16104      | 16882      | 17004      | 0          |
| WQLN Total | 1571       | 1638       | 1683       | 1679       | 1677       |
| WQPT Total | 0          | 0          | 0          | 0          | 0          |
| WRES Total | 111920     | 116751     | 113603     | 116091     | 111902     |
| WRET Total | 1287       | 0          | 0          | 0          | 0          |
| WRJA Total | 79570      | 81412      | 82538      | 83098      | 87464      |
| WRLK Total | 436        | 3330       | 5162       | 5183       | 5109       |
| WSBE Total | 239704     | 244729     | 210103     | 210134     | 213363     |
| WSBN Total | 24335      | 18057      | 17964      | 18101      | 18173      |
| WSFP Total | 0          | 0          | 0          | 0          | 0          |
| WSIU Total | 2271       | 2340       | 2457       | 2506       | 1452       |
| WSJK Total | 16654      | 13825      | 6555       | 6706       | 6968       |
| WSKG Total | 292        | 307        | 316        | 306        | 314        |
| WSRE Total | 1257       | 1300       | 1310       | 980        | 1251       |
| WSWP Total | 199        | 201        | 201        | 202        | 202        |
| WTCI Total | 0          | 0          | 0          | 0          | 0          |
| WTIU Total | 196903     | 201311     | 204863     | 181034     | 190984     |
| WTJX Total | 0          | 0          | 0          | 0          | 0          |
| WTTW Total | 1178       | 1340       | 251        | 251        | 0          |
| WTVI Total | 24892      | 25329      | 25242      | 26782      | 27304      |
| WTVP Total | 484        | 479        | 228        | 218        | 225        |
| WTVS Total | 26440      | 26829      | 27508      | 0          | 0          |
| WUCM Total | 94384      | 95172      | 97275      | 14638      | 13570      |
| WUFT Total | 0          | 0          | 0          | 0          | 0          |
| WUNC Total | 55493      | 56052      | 56163      | 56991      | 51180      |
| WUND Total | 0          | 0          | 0          | 0          | 0          |
| WUNE Total | 1645       | 1738       | 2088       | 2315       | 0          |
| WUNF Total | 425        | 195        | 210        | 211        | 211        |
| WUNG Total | 3231       | 3345       | 3402       | 3563       | 3639       |
| WUNJ Total | 5524       | 5281       | 5233       | 5300       | 5207       |
| WUNK Total | 179        | 341        | 336        | 304        | 332        |
| WUNL Total | 438        | 0          | 0          | 0          | 0          |
| WUNM Total | 179        | 341        | 336        | 304        | 332        |
| WUNP Total | 0          | 0          | 0          | 0          | 0          |
| WUSF Total | 252        | 262        | 1194       | 1040       | 1156       |
| WUSI Total | 5110       | 5063       | 5212       | 5191       | 4510       |
| WVAN Total | 5832       | 5997       | 1549       | 1567       | 1666       |
| WVER Total | 4641       | 4777       | 4662       | 4706       | 4779       |

Exhibit A

**Drop Summary**  
**Only Those Systems Within 50 Miles Included**

| Call               | dropped921 | dropped922 | dropped931 | dropped932 | dropped941 |
|--------------------|------------|------------|------------|------------|------------|
| <b>WVIA Total</b>  | 61408      | 61480      | 62301      | 61760      | 61774      |
| <b>WVIZ Total</b>  | 45930      | 45061      | 45819      | 44810      | 46597      |
| <b>WVPT Total</b>  | 873        | 921        | 1080       | 0          | 0          |
| <b>WVTA Total</b>  | 1222       | 1171       | 1262       | 1265       | 1316       |
| <b>WVUT Total</b>  | 19752      | 19853      | 20385      | 10249      | 10256      |
| <b>WWPB Total</b>  | 651        | 656        | 667        | 679        | 657        |
| <b>WXEL Total</b>  | 45771      | 50100      | 220        | 0          | 0          |
| <b>WXGA Total</b>  | 6124       | 6228       | 6362       | 5097       | 5127       |
| <b>WYCC Total</b>  | 74528      | 75290      | 55499      | 19389      | 24611      |
| <b>WYES Total</b>  | 139        | 139        | 138        | 0          | 0          |
| <b>Grand Total</b> | 10684000   | 10666554   | 10154036   | 7389509    | 7388516    |

**Exhibit B**

| 92-2 Subscriber Drops By System Channel Capacity and Number of Educational Stations Carried   |  |           |           |           |           |
|---|--|-----------|-----------|-----------|-----------|
| Shading indicates that the systems are already carrying the full number of public television stations required by the 1992 must carry rules |  |           |           |           |           |
|   | Number of Educational Stations Carried by the System |           |           |           |           |
| Cable System Channel Capacity   | 0  | 1         | 2         | 3         | 4+        |
| 1-13  | 7,747  | 3,257     | 0         | 0         | 0         |
| 14-36   | 116,352  | 460,716   | 827,460   | 77,381    | 101,261   |
| 37+   | 92,872   | 1,415,380 | 2,827,755 | 3,348,421 | 1,381,401 |
| not reported  | 2,688  | 3,863     |           |           |           |

[Exhibit C Redacted]